

Climate Change Enquiry Comments on the Departmental Responses to the Report

Comments by

Northern Ireland Environment Link

31 August 2010

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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Northern Ireland Environment Link welcomes the opportunity to respond to the Departmental responses to the Report produced by the Environment Committee as a result of its Enquiry. We would like to raise the following points in relation to the responses.

Lack of Timescales or Specific Actions. The lack of 'SMART' targets is worrying, as is the lack of specific actions tasked to particular departments with specific timescales. Who is 'considering' those aspects labelled TBC and on what timescale?

Limited Departmental Responses. It is worrying that only a limited number of the Departments; major responses have been supplied by DoE, OFMDFM and DETI, with limited comments by some additional departments such as DARD, DRD and DFP. The apparent lack of recognition of the impacts which climate change will have on all departments, and the role of all departments in delivering both adaptation and mitigation, is worrying. Even where Departments have responded there is a tendency to say what is happening and little about future actions. There is a strong attitude that 'what is happening is sufficient to meet the needs', when what is required is a much more creative approach to looking at how addressing climate change is increasingly essential.

Need for both Mitigation and Adaptation Strategies. (Recommendations 1,2,3,5,7,48). These need to be closely integrated with each other and with the Sustainable Development Implementation Plan and identify action across all government departments and agencies. Phased delivery targets are required with both short and medium term goals necessary if we are to reach the longer term targets. The rejection of action on adaptation plan reporting is not clear; some department must be allocated responsibility. While there is logic in it being the same Department as for mitigation, if there are reasons for this not to be the case the responsibility remains to designate some Department to have this responsibility.

Integration with the Sustainable Development Strategy and its Implementation Plan (2,4,5,6,15,49,50,51). While it is frequently mentioned that the delivery of the SD Strategy and its Implementation Plan are crucial for the delivery of action on climate change, a point we would strongly support, the action to date both in terms of involvement of stakeholders and of timely delivery leave much to be desired and we would have major worries that linking delivery of climate change action too closely and exclusively to the delivery of the SDS and SDIP may not be effective. Certainly much improvement is required in the public and stakeholder consultation mechanisms employed for the SDS and SDIP if climate change is to be effectively adopted across sectors. However, there is a very strong argument in favour of linking to the two aspects within one action plan and especially within a single coordinated communication and public awareness programme. Perhaps using the imperative for action on climate change could drive action on the sustainable development strategy on which there has been lamentably little progress in recent years.

Communication (3,25,39). A clear, integrated communication and public awareness programme is required, showing how all actions and decisions relate to climate change and how we can act (as citizens, businesses, civil servants, etc.) to address the issue while solving other problems – waste management, energy security, financial strictures, etc. This must include but not be restricted to the businesses of the size to be involved in CRC and EU ETS registration. Recommendation 3 is rebutted with reliance not on secondary legislation but on communication, unfortunately insufficient funds are available for such a communications campaign and at present recycling rates are decreasing, whereas a major increase is required if we are to meet targets for landfill.

Legislation and Targets (6,7,8,9,11,28,29,30,31). We strongly believe that a specific Climate Change Act is required to lend statutory authority to the achievement of targets. We support the inclusion of targets within the Programme for Government, the SDIP, but are concerned that, especially within current stringent government funding constraints, that they will not be fully delivered without statutory authority. Targets should certainly be fully integrated with the SDIP, but we are very concerned that this will not provide sufficient incentive for action. We support the recommendation for sectoral targets, but recognise that at this stage we do not have sufficient baseline information to make meaningful and achievable target levels. Integration of such targets with UK wide targets and inclusion of all drivers from GB to allow UK wide integration and ensure no disadvantage to Northern Ireland's companies. Targets, incentives and penalties all need to be coordinated across the UK to ensure compatibility and avoid disadvantage.

Structures (9,11,12,13,15,17,18). We strongly support the recommendation that climate change governance should be a major consideration in the proposed review of Departmental numbers and functions. Climate change action needs to be across all government responsibilities and all sectors, and guidance is required to assist all to understand their role and recognise the advantages of action. A single government department and Minister must be allocated responsibility for delivery. Clear lines of authority and reporting are required to ensure compliance and full participation. While the Audit Office could have a role in monitoring compliance, it is possibly clearer to leave monitoring and reporting arrangements with the DoE. We do feel that it is essential that the results are communicated to the Assembly, via the responsible Committee (at present Environment) and to the Executive. Publication of results should also be made public on an annual basis, perhaps to coincide with the release of UK figures by the Committee on Climate Change (rec 11). A coherent unit on climate change, integrating both mitigation and adaptation strategies and with responsibility for implementing and reporting on progress against the strategies, is required. We support the proposal that this should remain with DoE until and unless new structures are devised. A defined timescale for this review is required.

Local Government (20,21,22,23,40,51). The uncertain future structure and role of local government complicates delivery mechanisms for many aspects of climate change delivery. Clearly climate change requires a high priority within local government no matter what structures are eventually decided, and central government has an important role in providing guidance and coordination across all of Northern Ireland. This is particularly an issue regarding planning matters. Action to ensure that action on both climate change and sustainable development is required urgently.

International Aspects (4,24). We strongly suggest that recommendation 4 should include a requirement for engagement on an all-island basis; while this does add a layer of complexity it is imperative that climate change action is integrated across the international border as well as with other UK countries. The ability to access funds to assist Northern Ireland in its climate change work from EU and other funds should be taken.

Baseline Data and Monitoring (6,7,8,9,10,11). It is essential that Northern Ireland have baseline data upon which to base its targets, be they departmental, sectoral or other. Such data must be collected in a uniform way that is comparable to data collection in the rest of the UK, and as soon as possible targets need to be set to allow Northern Ireland to play its fair share; the assistance of the Committee on Climate Change should be sought in this. We must have clear and robust monitoring and reporting mechanisms, feeding back on progress to the Executive and public. While some delay to obtain baseline data and therefore set meaningful targets is understandable, this period must be minimised to

allow action to begin urgently. Accordingly a specific target date for the setting of Northern Ireland targets is required.

Economic Drivers and Green New Deal (25,26,27,29,34,35,52). The Committee has rightly ascribed considerable prominence to the Green New Deal initiative; the response of the Departments does not fully recognise the innovative nature of the proposals and we would urge more attention be given to these proposals. Promotion of sound climate change behaviour needs clear communication, fiscal drivers and legislation to ensure compliance if it is to achieve its goal of changing attitudes and behaviour throughout NI society. Fiscal drivers need to be consistent across the UK in order not to disadvantage local suppliers, installers or consumers.

Carbon Neutral Government Estate (16,19,28,32,33,36). The value of this target is to provide examples, drive investment and support local businesses. At this stage a target of 2015 is clearly unachievable, but the goal of leading by example should not be lost; a new target of perhaps 2020 should be established and committed to by all of the public service. 'Offsetting' should be seen as failure, not a significant contributor to meeting the target. This sort of target is only achievable if it is seen as a target for the entire government estate and is addressed through a coordinated approach, using large scale renewable as part of the solution. Public procurement should be seen as a vital aspect of delivering this target. Assistance of specialist advice organisations for government action will be required; the changes to structures on the UK level to Sustainable Development Commission, Carbon Trust, Energy Saving Trust etc. need to be recognised and appropriate action taken locally to ensure the vital services they provide are not lost.

Specific Sectors (36,37,38,39,40,41,42,43,44,46,47). The response of DRD regarding the importance of public transport in its new strategy is welcome, as is the recognition of the importance of waste management. However, the continuing funding crisis could have serious negative impacts on delivery of these programmes. Funding anticipated for support for NGO activity to promote sustainable waste management is under severe threat and the conflict over restricted funding between public transport and roads-based initiatives could result in the former being decreased or lost. The agri-food sector is especially significant in GHG emissions in Northern Ireland; much is being done on the research front but this needs to be expanded into farms. Targets need to be developed and work towards them begun as a matter of urgency given the significance of the sector for GHGs. A RCCF for NI would be most useful and should be set up, and the Rural White Paper must see climate change as a crucial aspect of its deliberations if it is to truly address the future of our rural community and landuse. There seems to be limited recognition of the role of conserving biodiversity as a fundamental part of addressing GHG. Far more detailed understanding needs to be promoted within government; 'TBC' seems a most inappropriate comment from the DoE for recommendation 46. International obligations are recognised, but again proposed action by departments is very weak, perhaps this is understandable given departmental roles, but that does not diminish our responsibility internationally.