

## **Green Party NI response to the DOE consultation on a Climate Change Bill for Northern Ireland**



The Green Party believes that urgent and immediate action on climate change is required. In spite of the international agreement to limit temperature rises to no more than 2°C, on our present trajectory we are on course to hit a temperature rise of more than 4°C. According to Kevin Anderson from the Tyndall centre for climate change, “There is widespread view that a 4°C future is incompatible with an organised global community, is likely to be beyond ‘adaptation’, is devastating to the majority of eco-systems & has a high probability of not being stable (i.e. 4°C would be an interim temperature on the way to a much higher equilibrium level). Consequently, 4°C should be avoided at ‘all’ costs.”

Finding a global solution to climate change is not just a technical and economic issue. The solution must also involve social justice, equity and interdependence. It is also an area where Northern Ireland should lead by example. The Green Party supports the contraction and convergence framework. Under such a system all countries would eventually converge on the same low emissions per capita. Developed countries would need to contract to that level quickly, while developing countries would contract much more slowly to that level, or in a few cases expand to meet it. This framework provides an opportunity for poorer countries to continue to eliminate poverty through development.

Under the contraction and convergence framework and to avoid warming exceeding 2°C, NI needs to adopt an initial annual carbon dioxide emissions reduction target of around 10 per cent to almost completely decarbonize the economy by 2030. The Green Party is concerned that the Government is failing to abide by this framework and that since 1990, NI has only managed a 15% drop in emissions levels.

### **Q1. Should Northern Ireland have its own legislation?**

The Green Party believes that Northern Ireland should enact primary legislation on this issue. Climate change ought to be considered the biggest moral crisis of our age which, if unabated, will result in immeasurable suffering and hardship in the future. Climate change should also be considered the biggest single threat to development as it could undo decades of progress in fighting poverty.

Not only is there is a clear moral imperative to do our bit to avoid catastrophic climate change but it is clear that the economic costs of inaction are great while the economic benefits of cutting emissions are large. Furthermore, climate change is already impacting on Northern Ireland and it is in our interests to cut emissions together with others.

Problematically, Northern Ireland has fallen behind other areas of the UK in reducing carbon emissions and this demonstrates that our current framework is insufficient. Although Northern Ireland current has a target to reduce emissions by 35% by 2025, no interim targets have been set. This is very problematic because short term political decisions to avoid immediate short term costs will require more costly rapid reductions in the future.

## **Q2. Is a long term target to reduce greenhouse gas emissions necessary?**

The Green Party certainly believes that a long term target to reduce greenhouse gasses is necessary. Such a target should be based on the international agreement to limit increases in temperature to no more than 2°C. In addition the carbon reduction pathway must ensure that we have at the very least the probability of a very good chance of not exceeding 2°C warming in the average global temperature. The Green Party notes that the DOE proposes to use a headline climate change target of an 80% reduction in emissions by 2050. Such a target, however, is a target for a levels rather than the total emissions budget. We note that the consultation document acknowledges that “atmospheric concentrations of greenhouse gases depend on the total amounts emitted over a long period of time”. Moreover the best budget by the Committee on climate change would still result in a 56% of exceeding 2 degrees while the UK Government has chosen to adopt a carbon reduction pathway which has a 63% chance of exceeding 2 degrees. In our perspective this far too high a probability.

## **Q3. Is an interim target to reduce greenhouse gas emissions for Northern Ireland necessary?**

The Green Party believes that it is crucial to set annual targets alongside interim milestones for greenhouse gas emissions reductions, particularly as concentrations of greenhouse gasses will depend on the total amount emitted over a long period of time. The Green Party notes the comments from the department which states:

If a Northern Ireland Bill is only operational from 2015, a 2020 target would in effect be short term and there may not be sufficient time for it to be delivered. There may be logic to perhaps align the interim target with the Executive’s Programme for Government target in 2025 or even pushing it back to 2030. However, this would not be in keeping with the 2020 interim targets approach in the EU, UK and Scotland.

The Green Party consider it unacceptable that the Department does not even consider a 5 year timeframe as sufficient to deliver cuts in carbon emissions. Given that the Executive are meant to already be implementing cuts to carbon emissions in their policy and given that Wales has set annual reductions of 3%, we are at a loss to understand why the department does not consider such cuts achievable.

## **Q4. Should targets be set in primary legislation (the Bill) or in subordinate legislation?**

The Green Party believes that targets should be set in primary legislation. We believe that it is crucial that long term targets are established and based on science. Such targets should be free from political interference, particularly in the event that there is a change in Government.

## **Q5. Should provision for an independent advisory body be included in a Northern Ireland Climate Change Bill?**

The Green Party can see merits in either the proposal to establish an independent advisory body or for the CCC to provide independent advice to Northern Ireland. However we believe on balance that

the CCC should be responsible for providing the Northern Ireland administration with independent and specific advice for NI.

**Q6. Should provision for reporting on adaptation measures by public bodies be included in a Northern Ireland Climate Change Bill?**

Yes.

**Q7. Should provision for reporting on mitigation measures by public bodies be included in a Northern Ireland Climate Change Bill?**

Yes.

**Q8. To which public bodies and /or statutory undertakers should the reporting duties apply?**

All major and relevant public sector organisations and NDPBs.

**Q9. Should provision for reporting on an adaptation programme to the Assembly be included in a Northern Ireland Climate Change Bill?**

Yes. The Green Party believe that we need to do much more to adapt our economy to a changing climate. This year's snow and last year's flooding are examples of the devastating impact that extreme weather can have on our society.

**Q10. Can you provide evidence on the impact the introduction of a Bill may have on economic structure, employment, performance and competitiveness relevant to Northern Ireland?**

The Green Party remains concerned that the department continues to separate economics and the environment. The reality is that our economy will not survive if the environment is not protected. The department must acknowledge that the economic structure, performance and competitiveness of Northern Ireland will be completely irrelevant if the climate warms to 4°C. The Green Party understands that the short term economic impact of climate adaptation cannot be in any way used as an excuse for not acting.

In spite of this, the Green Party is confident that transforming our economy to reduce carbon emissions will have an overall positive impact. Although there will be an upfront cost, there will be many benefits afforded to our economy as a consequence of a low carbon transformation. Reducing our energy consumption by remodelling our economy and increasing our domestic energy production from renewable energy will result in a reduction in our fossil fuel imports and a significant improvement in our balance of payments. Moreover any improvement in our balance of payments will have a positive multiplier effect for the local economy – particularly when fossil fuels are increasing in prices so significantly and when prices are becoming more volatile. The Green Party also notes that a reduction in the consumption of fossil fuels will also significantly reduce the pollution and have positive health impacts. We also note that investment in renewable energy and energy efficiency is more labour intensive than investment in fossil fuel resources.

The Green Party believes that it is inevitable that a low carbon transformation the global economy will take place. We therefore consider it crucial that Northern Ireland acts early and leads this transformation to take advantage and gain a competitive advantage in the Green economy. Moreover the most competitive economies in the future will be the economies which have prepared and invested in climate change adaptation.

The department have stated that “cutting emissions too quickly over a given period of time can have severe cost implications,”. However, given that the present value of future marginal costs rises over time meaning that the costs are reduced by accelerating, not delaying action. There is no economic case to be made in delaying robust action. The department have also stated “it is equally important that whatever final figure is arrived at, it is achievable”. The point however must be reversed and the question should be asked whether civilization is possible in a world of 4°C is possible? The Green Party notes that the costs to both our economy of inaction are enormous. It is crucial also that the negative impacts on the global economy as a consequence of climate change are taken into account in a local cost benefit analysis. Leaving aside the moral imperative to act to protect the poorest and most vulnerable people in the world, any negative shocks to the global economy will inevitably have a negative impact on the Northern Ireland economy. Climate scientists do not regard a 4°C warming in the global average temperature as being compatible with an organised global community - Failing to act will therefore result in economic ruin. The Green Party believes that the net impact is what should count in decision making. We concur with the findings of the Stern Review which stated that the benefits of strong early action on climate change outweigh the costs and note that the author, Nicholas Stern, now believes that his review underestimated the risks and that climate change is far worse.

**Q11. Do you have any comments in respect of the issues raised in this pre-consultation document or are there any important issues you feel have not been adequately covered?**

The Green Party believes that our climate change legislation should be based on the most up to date science. While we think NI should be informed by the UK, we do not believe that the NI legislation should necessarily replicate all aspects of the UK bill but should instead examine how the UK could be improved and incorporate the latest scientific research.

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