Pre-Consultation seeking views on the need for a Northern Ireland Climate Change Bill
A response from RSPB Northern Ireland
May 2013
Summary
Climate change is the greatest threat facing both people and planet. Impacts on the natural world are already apparent, and have the potential to be catastrophic.

The RSPB has been working to address the challenge posed by climate change for many years. We have worked with others to mitigate the extent of future climate change by working to reduce emissions of greenhouse gases. Given historical emissions, however, our climate is already changing, and both human and natural systems will need to undergo adaptation\(^1\) to survive.

Without urgent mitigation action, climate change is predicted to result in an unprecedented global extinction crisis and an unmanageable burden for many developing countries. But even if we make early and deep cuts in emissions, we are already committed to a minimum approximately 2 degrees of warming by the end of this century, as a result of current and historical emissions. There is growing evidence of the predicted – and actual - impacts of this on the natural environment and the world’s poor. A vigorous response is needed now; including a commitment that protection for biodiversity and the promotion of sustainable development will be at the heart of all future Government adaptation programmes. The RSPB and 25 other leading conservation bodies have recently highlighted this fact in the ‘State of Nature’ report. The headline to this report is that 60% of the UK's species are in decline and we need a concentrated effort on all fronts to give nature a home in the wider countryside\(^2\)

RSPB Northern Ireland (NI) is pleased to be able to give our views on this import issue and look forward to working with the Executive and other stakeholders in bringing about an ambitious Climate Change Bill for NI. The RSPB is also a member of the Stop Climate Chaos coalition in NI which will also be responding separately.

Q1. Should Northern Ireland have a Climate Change Bill?
The RSPB believes that a Climate Change Bill for Northern Ireland is an economic, environmental and moral imperative. As a relatively small country with a large renewable energy resource, Northern Ireland can and should be at the forefront of the global low carbon transition. The long-term political commitment provided by a Climate Change Bill would provide the certainty required for investors and the business community to get behind this vision.

Furthermore, Northern Ireland’s economy and natural environment is vulnerable to climate change. A Climate Change Bill would provide the opportunity to establish a framework and ambition that would ensure economic and ecological resilience to the changes in our climate that historic and current greenhouse gas emissions have already committed us to.

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\(^1\) The IPCC define adaptation as “the adjustment in natural or human systems in response to actual or expected climatic stimuli or their effects, which moderates harm or exploits beneficial opportunities”

RSPB Northern Ireland believes that the devastating impacts of unchecked climate change on nature, and the consequences of these impacts for human societies across the world, make a strong case for urgent and effective action on climate change. We therefore fully support the need for a Climate Change Bill in Northern Ireland.

Projections from Met Office and other models indicate that we have less than five years left to halt the rise in global greenhouse gas emissions, if we are to have a realistic chance of containing climate change within the globally agreed maximum of a 2°C rise in global temperature. Indeed, the world’s current commitments to reduce emissions of greenhouse gases are consistent with an increase of 3°C (50:50 chance) in temperature, a temperature not seen on this planet for around 3 million years, with a serious risk of a 5°C rise – a temperature not seen on this planet for about 30 million years. Nature and ecosystems are already being affected by climate change, and the dangers will increase as temperatures continue to rise. The financial, social and environmental costs of taking action now to curb emissions are much less than those we will have to face in a world of dangerous climate change³ if we neglect to take action now.

Although NI has signed up to the 2008 UK Climate Act, there is no onus on NI to reduce emissions as a result. Therefore there is a significant moral imperative for NI to produce its own legislative baseline for climate change enabling the NI Executive to lead on mitigation and adaptation to climate change.

Q2. Is a long-term target to reduce greenhouse gas emissions for Northern Ireland necessary?

A long term target for reducing greenhouse gas emissions is necessary because it establishes the direction of travel, gives key economic sectors such as energy long-term certainty, and demonstrates leadership to the international community. The target must, however, be at least if not more ambitious than the UK Climate Change Act, be based on the latest climate change science, and be compatible with Northern Ireland’s existing commitment through the Copenhagen Accord to cut its emissions in line with the overall objective of keeping climate change to below 2 degrees Celsius.

It’s important to note that long-term targets are particularly important in terms of guiding infrastructure development. New power stations, for example, have operating lives of forty years plus, whilst transport infrastructure lasts even longer. A long-term target is therefore important for those involved in planning and investing in such developments as it can help them ensure stranded assets are avoided.

Globally, greenhouse gas emissions need to be reduced by at least 50% by 2050 to achieve the 2°C target. The RSPB supports this target and believes this must form the basis of any NI climate legislation as we move forward. Evidence suggests that the cost of decisive, early action outweighs the cost of the burden we will shift to future generations⁴ (Stern, 2007). The

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⁴ N.Stern (2007) *The Economics of Climate Change.* Cabinet Office, HM Treasury
scientific consensus behind human-induced climate change and the dire implications for our natural environment, if we do not respond, are overwhelming. Most of the world’s species have evolved in a much cooler global climate than the one we now face. Studies predict that by 2050, a third of all land-based species could be on the pathway to extinction under a ‘business as usual’ emissions scenario. According to the Inter-governmental Panel on Climate Change (IPCC), if no action is taken to stem climate change we may see a rise in average global temperatures of up to 5.8°C in this Century. This would cause havoc to natural systems and humankind’s economic, political and social systems may be unable to cope.

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

It is cumulative greenhouse gas emissions to the atmosphere that determines the degree of climate change that will take place rather than the level of emissions in any given year in the future. Larger cuts now, for example, mean that lower annual reductions in CO2 will be needed to be delivered in the future. As well as having a long-term target, interim targets are therefore required. We believe that the UK carbon budget system provides an appropriate framework for establishing such targets, and recommend that a similar approach is taken in Northern Ireland. The advantage of such a system is that the Budget is established over a number of years (five in the UK case), which is flexible enough to allow for fluctuations as a result of external circumstances (e.g. an unusually cold winter) whilst setting a sufficiently robust and clear target.

Interim targets developed with an evidence based understanding of what actions are needed in different sectors to meet the long term target, will ensure that Northern Ireland is on the right trajectory to achieving its ambitious goals. It also needs to be emphasised that unless these interim targets are met, meeting the long term target will be exceptionally difficult. If it looks like interim targets are not going to be met then remedial actions need to put in place to ensure that the long term goal is still achievable.

In addition to interim targets on greenhouse gas emissions reductions, we are also keen to see targets for reducing overall energy demand in Northern Ireland and for increasing the proportion of energy supply from renewable sources. This would incentivise action to improve energy efficiency and other demand side response measures, and increase confidence in investing in renewable energy technologies.

Yes, and this should be aligned with the 2020 interim targets approach in the EU, UK and Scotland. As N.I. should already be working towards the Executive’s Programme for Government (2011-2015) Target of a reduction of at least 35% by 2025 on 1990 levels, then any concerns regarding delivery of the short term interim target of 2020 are considered to be unfounded. Given that greenhouses gases remain in the atmosphere and continue to absorb heat for a long time, it is imperative that measures to reduce such emissions are effective sooner than later. It would not be environmentally responsible to delay or push back targets.

Q4. Should targets be set in primary legislation (the Bill) or in subordinate legislation?
Primary legislation is the appropriate way forward, as this would follow the UK and Scottish Acts. The RSPB is concerned that the setting of targets within the subordinate legislation could result in target dilution. We would also query the ‘uncertainty attached to Northern Ireland greenhouse gas emissions data’ (p28 of consultation) which is raised as a potential threat to setting targets in the primary legislation. The long term target should be set in primary legislation as this will give it a higher status and will provide stronger reassurance to investors about investing in renewable energy technologies and other emissions reduction measures.

Q5. Should provision for an independent advisory body be included in a Northern Ireland Climate Change Bill?
Yes, this will enable the development of specialist expertise on greenhouse gas emissions reductions and adaptation in the Northern Ireland context. In particular they would provide a valuable role in understanding the steps needed to put Northern Ireland on the right trajectory for meeting the long term target, and set appropriate interim targets to ensure that action is delivered on the ground within an appropriate timeframe.

For the UK, the Committee on Climate Change has been invaluable as an independent, evidence-based voice identifying an appropriate trajectory towards achieving long term targets, and advising on the balance of sector effort needed to achieve this. They also provide an important challenge to Government decisions which are not seen to be in accordance with long term emissions reduction targets such as ongoing support for fossil fuels without Carbon Capture and Storage technology.

The Committee on Climate Change which has been set up to provide independent advice to the UK Governments and devolved administrations provides an already existing resource which should be fully utilised to save on duplicating effort. However, it is interesting to note that Scotland made provision for their own independent body, but to date continue to avail of the Committee on Climate Change.

Q6. Should provision for reporting on adaptation measures by public bodies be included in a Northern Ireland Climate Change Bill?
Yes. Adaptation for wildlife, habitats, ecosystems and the ongoing provision of their services often needs to planned and actioned in advance of climate change impacts, and issues discussed openly and in partnership with civil society. Adaption needs to be integrated across sectoral interests, to maximise the potential for synergistic adaption and prevent inappropriate adaption in one sector that may adversely affect other interests.

Q7. Should provision for reporting on mitigation measures by public bodies be included in a Northern Ireland Climate Change Bill?
Yes. There needs to be a system for public bodies to report on their mitigation measures to ensure that this is recognised as an organisational priority within these bodies.

Q8. To which public bodies and/or statutory undertakers should the reporting duties apply?
The RSPB believe Mitigation should apply to All Government departments and QUANGOs and Local Authorities. The NI Executive
Adaptation: Environmental bodies and departments, and Local Authorities

Q9. Should provision for reporting on an adaptation programme to the Assembly be included in a Northern Ireland Climate Change Bill?
Yes. A coherent adaptation programme should be instigated by NI Govt, as this will safeguard NI businesses, infrastructure, environment and ecosystems, and communities and society. Research shows that taking early adaptation measures is the most cost effective approach to climate change impacts. It will also be more effective to pro-actively integrate adaptation across different sectors / interests. This is especially true for adaptation for the environment, which should be both an underlying, cross-sectoral theme for adaptation, as well having its own sectoral adaptation interests, including water, agriculture / forestry, biodiversity and access/recreation.

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?
Failure to adapt appropriately will hinder medium and long term competitiveness and erode environmental quality. See Parry report above

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 impacts of CC on NI biodiversity are already apparent. It is a vital importance of integrated pro-active adaptation to build resilience against the impacts of climate change and help to accommodate biodiversity and habitats to the inevitable changes climate change will bring. There is a clear need to protect blanket bog habitats across Northern Ireland so that future generations can appreciate their worth and their beauty.

Peatland blanket bogs are one of the most important habitats found in Ireland, if not globally. They are home to rare wildlife, provide much of our drinking water, and underpin the rural economy through activities such as farming. Their role as stores of carbon has been recognised in recent years and will be an important part of the adaptation jig saw. NI recently signed up to an International Union of Conservation of Nature (IUCN) charter for protecting peatland and it is important that this adaptation step is reflected in any climate strategy going forward. NI has a significant peatland resource which must be looked after if we are to stand a chance of combating climate change.

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5 http://mlparry.com/docs/Adaptationcosts_Environment_final_12Nov09.pdf