

**Draft Belfast City Council response to the Consultation on the establishment of a Just Transition Commission**

**Q1. Do you agree with the proposal that the Commission should be established as an Advisory Non-Departmental Public Body with the chair and its members recruited in line with the guidance issued by the Commissioner for Public Appointments.**

Yes

Belfast City Council welcomes the establishment of the Just Transition Commission and looks forward to supporting the Commission in its work.

**Q2. Do you agree the Commission membership should be between 7-20 members?**

No

Whilst the proposed membership is appropriate and consistent with the membership size of the Irish and Scottish Just Transition Commissions, it is important that the membership reflects the various sectors and stakeholders within Northern Ireland. We envisage that the Membership would need to be closer to 12 – 20.

**Q3. Do you agree the Commission membership should meet on average 15 days per year?**

Yes

**Q4. Do you agree that the Commission should be similar to the Scottish model and supported by a small team to provide a secretariat function to allow the Commission to function effectively?**

Yes

We believe a small team is essential to support the work of the Commission by assisting with research, decision-making, coordination, and the organisation of meetings and publications. Sufficient resources (budget and people) will be required to ensure meaningful community engagement underpins the work of the Commission.

The Scottish Just Transition Commission has proven to be successful and provides a good model for us to build on.

**Q5. Do you agree that members appointed to the Commission should serve a term of 5 years?**

Yes, 5 years is consistent with the terms of other Advisory Non-Departmental Public Bodies in Northern Ireland.

**Q6. Do you agree that the Commission would fulfil the oversight function required of it in the Act by reviewing and reporting on the development and implementation of**

- any sectoral plan published under sections 13 to 21 of the Act;
- any climate action plan published under section 29 or 51 of the Act; and
- any scheme established by Regulations under section 31 of the Act.

Yes

**Q7. Do you agree that the Commission would be fulfilling its advice function by:**

- **Responding to a Northern Ireland department's request for advice within agreed timeframes.**
- **Issuing research and guidance documents for departments to review and consider when developing emission reduction policies.**

Yes

Whilst Belfast Council is very supportive of this advice role, we would like to see a stronger commitment and recognition of the roles of local government and the voluntary and community sector. A collaborative and joined-up approach is essential to achieve climate ambitions. Key functions of the Commission should include:

- Ensuring the views of stakeholders (challenges and opportunities) are captured and understood when developing guidance or other recommendations.
- Promoting collaboration and joined up approaches to climate mitigation and adaptation.

**Q8. Should the Commission include representation from the Transport sector**

Yes

Domestic transport is the second-highest source of greenhouse gas emissions in Northern Ireland (18%), therefore it is essential that this sector is represented on the Just Transition Commission and that it is involved in working collaboratively to ensure prompt, effective and fair action that helps achieve emission reduction targets.

Transport is a broad and diverse sector encompassing public transport, private vehicles, freight, and infrastructure, all of which must be addressed comprehensively. Representation of both the public and private transportation sectors is vital to ensure policies consider the full spectrum of challenges and opportunities presented by all modes of transport, enabling a coordinated and equitable transition to sustainable transport solutions.

**Q9. Should the Commission include representation from the Energy sector?**

Yes

Electricity supply is the fourth highest source of greenhouse gas emissions in Northern Ireland (14%) and therefore it is essential that the energy sector is represented on the Commission.

Ideally, representation from both the renewable energy sector as well as traditional energy industries would allow for a just transition by ensuring balanced perspectives, addressing the needs of workers and communities affected by the energy transition, and fostering collaboration to develop sustainable and equitable solutions. A just transition in the energy sector involves decarbonising the sector while also improving people's quality of life and addressing inequalities.

**Q10. Should the Commission include representation from the Financial/Green Finance sector?**

Yes

Belfast City Council recognises the critical importance of green finance and financial resources. Financing a Just Transition will take many forms, with measures ranging from the macro to the micro. The ability of government to borrow at a low cost over the very long-term means public finance will play a crucial role in funding a fair transition for workers, communities and consumers, ensuring the financial burden is managed and shared equitably.

It's important for the Commission to consider how financial leverages can be used to enable our climate ambitions. Including a representative from the finance sector would support the Commission in meeting its objectives and is consistent with best practice in Scotland.

We believe a focus on Inclusive Growth expertise would be particularly beneficial in addition to the financial / green finance sector.

Private finance can also help ensure a just transition by redirecting financial flows to green technologies, adaptation solutions, and innovative businesses. Financial institutions can support emission-intensive businesses to lower their emissions and provide communities with access to finance to invest in measures that will support the transition. The representative on the Commission will therefore need to have a broad experience and knowledge of both public and private finance instruments, and an understanding of inclusive growth i.e. in keeping with the principles of a just transition.

**Q11. Are there any other sectors in addition to the Transport, Energy, Finance and those listed in 37(4) of the Act that should be represented on the Commission – and if so, please provide reasons for your answer.**

Yes

Local Government should be represented on the Commission. At 3.7.6 of the consultation document, DAERA recognises that *“Given the active role that many local authorities here provide in delivering on climate action the Commission is likely to also interact with Northern Ireland’s 11 local councils as well as other public bodies in Northern Ireland, including other Commissions or Commissioners.”*

Belfast City Council strongly believes that the role and contribution of local government, both in terms of its delivery of climate actions and at a civic leadership (democratically elected) level should be formally reflected in the Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2024 and that this sector should be a named sector within the Schedule.

Local government representation could be coordinated via Solace or NILGA; however, it would be important to have representation from both urban and rural district council areas given the distinct challenges and circumstances facing these different communities. Whilst the consultation document recognises rural communities, they are categorised within the agriculture sector. It is vitally important that all our different communities have a clear voice in the Commission. The local government sector has a proven track record in representing and serving their diverse communities, and our experience with equality, inclusive growth and community planning, for example, will be critical for ensuring a just transition.

Whilst the Schedule includes reference to civic society, we note that this is an extremely broad and diverse sector, which will be crucial to helping government achieve climate targets. It may be beneficial to expand or clarify how representation from this sector will be achieved.

Buildings and product uses is the third-highest source of greenhouse gas emissions in Northern Ireland (15%), so it is important that a representative from this sector is included on the Just Transition Commission. While this sector is briefly mentioned under Energy on page 38 of the Consultation, we recommend a distinction between the supply of energy and use of energy within buildings. A distinct representative would ensure focused attention on the broader range of emissions associated with the fabric of buildings and associated product use, as highlighted in the *Northern Ireland Greenhouse Gas Emissions 2022* report. A sector-specific representative would provide expertise to inform strategies such as building energy performance, retrofitting, sustainable design and construction practices, and the decarbonisation of heating systems. Embodied carbon accounts for a large portion of a building's carbon footprint, therefore a building expert's input would be critical in fostering innovation to reduce embodied carbon in building materials and enhance building and product life cycles. The representative should advocate for targeted, actionable measures tailored to industry needs.

The business community and education and skills sector will have an important role to play in supporting a just transition (via green growth opportunities) and therefore should be represented on the Commission. Additionally, as the business community and economy sector are dominated by SME's, who could be adversely

impacted by higher energy and other costs associated with the transition, it is important that they are enabled to have a voice on the Commission, for example via an appropriate body such as the FSB.

**Q12. Do you agree the Commission should have a power to establish Ad-Hoc Committees or working groups to secure additional knowledge or expertise that may not be available with the Commission**

Yes

The ability to establish *ad-hoc* committees is essential.

This is also consistent to Scotland's Just Transition Commission - see Section 4.1 of their Terms of Reference and has been instrumental in supporting the Scotland Commission's work. We believe that adopting the objectives and operational principles outlined by the Scottish Just Transition Commission would enable the Commission to enhance its functionality and impact and will ensure the timely contribution of relevant expertise, knowledge and experience.

**Q13. What do you think the key initial priorities should be for the Commission?**

**Participation and collaboration.** The Commission must place a strong emphasis on stakeholder engagement and prioritise efforts to develop meaningful dialogue and participation, particularly with communities and groups most affected by the transition. Ensuring their perspectives shape the Commission's plans will help build an inclusive and equitable framework. The Commission should promote the use of community planning structures to enable co-creation and participation in transition planning. The Belfast Community Planning Partnership has recently approved a Co-design Framework (<https://yoursay.belfastcity.gov.uk/a-co-design-framework-for-belfast>) which could be a helpful approach for the Commission to adopt in appropriate circumstances.

Equally, building public trust and support for higher climate ambition is critical. If governments can demonstrate the socio-economic benefits afforded by a green transition, including economic benefits and new green jobs, they can build a broad base of public support with citizens more likely to get behind the associated policies and investments. This will require effective communication and meaningful engagement with Northern Ireland residents and stakeholders. A clear communications plan and programme of engagement will be essential if the Commission is to understand local challenges and opportunities and work collaboratively to bring about changes in behaviours and processes. The engagement plan should detail how seldom heard groups, including minoritised voices and socially excluded or disadvantaged groups will be supported to actively participate. Stakeholder involvement should extend to co-producing actions or recommendations to enhance collaboration, ensuring transparency and shared ownership of the transition process, which will lead to improved outcomes.

**Addressing social risks.** An early priority for the Commission should be to anticipate, assess and address the social risks of the transition (e.g., employment shifts, impact on supply chains etc.). This means firstly, assessing the social implications (costs, risks, benefits and opportunities) of transition plans and tailoring just transition responses to sector and geographical priorities, and secondly, integrating just transition factors into the goals, ambitions and foundations of all sector plans linked to the transition.

**Supporting a green jobs revolution** in which the alternative jobs created have guaranteed living wages, proper workplace safety protections, and health benefits. These quality jobs will lift people, their families, and their communities up. But they will also help attract the workers needed for the economic transformation.

**Laying the social groundwork for a resilient and inclusive net-zero economy.** Identifying and enabling the social opportunities and co-benefits of the transition (e.g., community and cooperative energy options, good relations impacts, reducing energy poverty, improved air quality etc.) will maintain consent and support for

the transition. With transparent planning and the active participation of a broad range of stakeholders, governments can minimize the fear, opposition, and inter-community and generational conflict that may upend the move away from fossil fuels of old and other harmful activities that are warming our planet, such as deforestation and wasteful production practices.

**Driving local solutions.** By applying a just transition lens to climate action, and undergoing the consultative processes associated with achieving just transition, the Government can better understand the impacts (positive and negative) of bold climate action and then identify the best solutions given our local context. Closely aligned to the civic engagement, a key challenge for the Commission will be understanding the local context and developing solutions that are meaningful and deliverable at a regional level so as to unlock the greatest benefits.

**Reinforcing the urgency for concerted efforts to combat climate change.** Transitions are often disruptive – and deliberate effort is needed to make them smooth. A just transition strategy, embedded within short- and long-term climate plans like NDCs and LTS, will help leaders stay focused on the urgent task at hand of rapid decarbonization, while also striving for fair and inclusive outcomes.

**Focus on high-impact sectors,** including agriculture, transport, buildings and energy. These sectors are the largest contributors to greenhouse gas emissions in Northern Ireland and present the greatest opportunities for transformative actions to achieve significant emission reductions. The creation of sector-specific just transition plans, as outlined in the Scottish *Initial Report of the 2nd Just Transition Commission*, serves as a strong foundation for transitioning sectors.

**Supporting processes.** Ideally, the Commission should establish a robust monitoring and evaluation framework with clearly defined milestones and indicators for tracking progress, developed in collaboration with stakeholders. Drawing from insights in the Scottish *Initial Report of the 2nd Just Transition Commission*, addressing cross-cutting issues, such as financial mechanisms to support the transition and enhancing social infrastructure, is essential for guiding the Commission's work.