

Questions	Draft response
Relates to Chapter 5: Quantification Summary	
<p>Q1. To what extent do you agree with the quantification methodology used to calculate emissions reductions from policies and proposals?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree</p> <p>We note that some sector leads commissioned external organisations to undertake modelling of projected emissions reductions from policies and proposals whilst others conducted the quantification internally by policy analysts. Whilst variation in methodologies is not ideal, by using the standardised UK GHG Inventory Reporting Protocol and the latest GHG Inventory data the quantification methodology is credible and robust.</p>
<p>Q2. Do you have any comments on the quantification methodology used to calculate emissions reductions from policies and proposals?</p> <p>Yes/No If yes, please provide your comments.</p>	<p>No</p> <p>We agree with selecting the Central Scenario of GHG emissions reductions associated with the proposed policies and proposals as the most realistic delivery certainty scenario.</p>
<p>Relates to Chapter 6: Sector Policies and Proposals</p> <p>Energy Production and Supply Sector Contribution to Carbon Budget 2023-2027</p> <p>Energy production and supply emissions are almost exclusively from burning fossil fuels for electricity generation at power stations.</p>	
<p>Q 3. To what extent do you agree with the proposed policies and proposals to reduce emissions for the energy production and supply sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives.</p>	<p>Agree</p> <p>The consultation acknowledges the critical role that a replacement Renewable Energy Support Scheme will have both in terms of meeting climate objectives and also the 80% of electricity consumption from renewable energy by 2030 target. We look forward to seeing more detail on the Renewable Electricity Support Scheme for Northern Ireland.</p>

	<p>However, without a complementary additional policy towards storage, this alone could lead to higher electricity bills for consumers (from constraint payments) and additional challenges for the grid operator. We would welcome a policy embedded within the production and supply sector that encourages the development of larger scale flexibility services such as heat network with thermal stores opportunities for pumped hydro, traditional battery energy storage systems or other innovative storage ideas. The declining penetration of renewables on the grid is a direct result of grid constraints. Adding more intermittent sources of power generation will require more storage to be available. We would welcome more clarity on the legislative changes that DfE will make to facilitate greater connection of energy storage facilities to the network and on how DfE will facilitate the participation of aggregators in the electricity market.</p> <p>The scheme will need to resolve barriers to renewable energy deployment which include a lack of financial incentives and planning related processes/ timelines. Resolution of these challenges would enable new renewable projects to be delivered faster and at lower cost.</p> <p>Another key barrier to renewable electricity generation has been managing the grid impacts of renewable technologies. The energy transition will require significant upgrades to the electricity network. NIE Networks has begun the initial phases of procurement as part of its planned £2.3 billion investment over the next six years to upgrade the electricity transmission and distribution network. Significantly more investment will be needed than is currently planned to meet rising electricity demand and increased supply of renewable electricity. Clarity is required around how DfE will work with NI Electricity Networks and SONI to strengthen the grid, streamline planning processes and remove policy uncertainty, all of which are currently hindering progress in this sector.</p>
<p>Q4. To what extent do you agree with the proposed approach to achieving a just transition in the energy production and supply sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree</p> <p>Policies and proposals listed in the Energy Section consider the importance of consumer protection, affordability and fairness, all of which are Just Transition principles. The document also cites the importance of upskilling the workforce and new green jobs that will be created through, for example, the Offshore Renewable Energy Action Plan and the NI Green Skills Action Plan.</p> <p>We note that whilst the requirement for a Just Transition Commission exists in law, it was not operational in time to influence the drafting of the CAP or the Policies and Proposals referenced within it, limiting the Commission's ability to shape energy sector policies. This could result in a lack of equity-focus in energy policies. There is also some ambiguity around funding to support communities most affected by the energy transition, for example in rural areas, or in areas where manufacturing industries are most</p>

	<p>prevalent. Clarity is required on how success in achieving a just transition will be measured across energy policies.</p> <p>Currently, grid connection fees cost the same for a developer as a community energy group. We think, the government should have targeted support for community energy projects which considers the prohibitive costs associated with connecting to the grid. We think, penetration of renewables, battery energy storage systems and other low carbon technologies at scale is possible, if we can empower communities to drive on their own projects. The targeted support at the grid costs, should form part of a wider support package aimed at empowerment of community energy projects and groups</p>
<p>Transport Sector Contribution to Carbon Budget 2023-2027 – The transport sector includes emissions from surface road transport, domestic shipping and aviation, and aircraft support vehicles. It is the second largest contributor to emissions in Northern Ireland.</p>	
<p>Q 5. To what extent do you agree with the proposed policies and proposals to reduce emissions for the transport sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree</p> <p>The CAP provides a robust strategic framework to align Northern Ireland’s transport policies with the net zero emissions target by 2050. We would welcome greater detail on the mechanisms to deliver transport decarbonisation and how this will be delivered.</p> <p>We recognise that the climate and sustainability impacts of this sector should consider the global supply chain of proposed fuels and technologies. The methodology used is based on total energy management for fuel switching and ignores the supply chain of rare earth metals and availability of biofuels. Whilst fuel switching might be easier to attain and maintain than modal shift, the impact of fuel choice in isolation is only a partial consideration and could be considered short term solution that ignores significant supply chain risk.</p> <p>Reducing journeys and modal shift especially in urban areas would be likely to come out on top of any analysis which took a view of sustainable and net zero carbon in 2050 and beyond. The type and scale of behavioural change needed requires a combination of policy interventions along with well resourced programmes to normalise social change along with very significant levels of additional funding for public transport.</p> <p>The plan appears to give limited emphasis and support for reducing journeys although this is likely to be an important lever in urban and peri-urban areas. Policies that aim to reduce car dominance, ownership and free up land for active travel, public realm, greening and economic development should be factored into any policies that aim to reduce emissions particularly in urban settings such as Belfast in order to support a sustainable, liveable and climate resilient city. For example, policies that incentivise city centre living alongside settlement in urban centres and reduce urban sprawl. We would also point to the ‘Good Relations Segregation and the Environment – Breaking Down Barriers Report’ which highlights the duplication of public services and</p>

	<p>assets that has arisen due to the continuing segregation of communities and additional cost of reducing emissions in this context. We would welcome policies that seek to address this segregation handicap.</p> <p>The Plan also fails to address the current requirement for a certain no of car parking spaces for new developments which conflicts with policies to discourage car uses especially in urban areas. We would welcome early reform of this requirement.</p>
<p>Q 6. To what extent do you agree with the proposed approach to achieving a just transition in the transport sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives.</p>	<p>Disagree</p> <p>This area of the Climate Action plan could be strengthened by the legal requirement for a minimum level of active travel funding. This investment will be critical for people in urban areas and for those without access to cars and will provide health and well-being benefits as well as improved urban environment and air quality. The proposed expansion of EV charging infrastructure in public and workplace settings is also vital, especially in rural areas. If delivered well, it will avoid excluding rural communities from the low-carbon transition.</p> <p>However, there is a particularly strong focus on private solutions like EV ownership which low-income households will not be able to afford in the short term. A significant proportion of Belfast homes would not have dedicated private parking space that could allow relatively low-cost home EV charging.</p> <p>One of the overall aims of the Belfast Local Development Plan is to discourage the reliance of individual car use and encourage journeys by public transport and active travel. Sustainable urban form is supported by strategic policies including our ambitious growth strategy, which will encourage the proximity principle of homes and services, sustainable development, improving health and wellbeing, positive placemaking, environmental resilience, connectivity and green and blue infrastructure. The principle of compact urban forms that encourage higher housing densities at sustainable locations was largely founded on the idea of reducing the need to travel and support public transport efficiency.</p> <p>One of the key aims of the Belfast LDP '<i>Building a smart and connected and resilient place</i>' states:</p> <p><i>The plan will encourage the expansion of green infrastructure networks for walking and cycling to encourage active travel and improve air quality and promote increased use of public transport whilst retaining suitable provision for cars.</i></p> <p>It is not clear how the CAP plans to shift patterns of transport behaviour in urban centres towards active travel in the context of this policy area.</p> <p>Strategic Policy SP7 Connectivity states also:</p>

	<p><i>The council will support connectivity to and within the city by sustainable transport modes, such as public transport, walking and cycling. Land for sustainable transport infrastructure projects will be safeguarded and opportunities to protect and enhance existing provision will be maximised.</i></p> <p>The subtext of this policy advises:</p> <p><i>Thematic policies support the integration of sustainable transport networks and land use to improve connectivity, reduce traffic volumes and promote sustainable patterns of mobility. This will require the intensification of mixed use development in accessible locations along existing and planned public transport corridors such as the Belfast Rapid Transit routes. This will enable the development of a compact, walkable city with mixed-use communities, connected to high quality public transport and active travel networks. A key consideration for assessing development proposals will be how the location and design of developments can change travel patterns and improve accessibility by sustainable modes of transport other than the private car.</i></p> <p><i>TRAN 8 in the Belfast LDP states:</i></p> <p><i>Consideration should also be given to parking provision for electric vehicles with access to charging points in development proposals where appropriate.</i></p> <p>Investment in EV infrastructure should be taken forward in line with the planning policies stated above. Where appropriate, targeted investment such as grants for low-income households could be used to ensure equity, and instruments to promote the used EV market be considered.</p> <p>Like Scotland, Northern Ireland could develop a Just Transition Transport Plan to fully address job transitions in the transport sector including reducing inequality, reskilling, manufacturing opportunities and logistics.</p>
<p>Business and Industrial Processes Sector Contribution to Carbon Budget 2023-2027</p> <p>Business emissions from stationary combustion in industrial and commercial sectors including industrial off-road machinery, refrigeration and air conditioning, and the use of fluorinated gases for other applications.</p>	
<p>Q7. To what extent do you agree with the proposed policies and proposals to reduce emissions for the business and industrial processes sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree</p> <p>Large consumers -we would prioritise broadening the energy management elements of the policies, as with large consumers there should be an energy management first approach. On site generation, fuel switching etc should always come after a robust energy audit.</p> <p>Waste heat – we would be keen to see policies that incentivise the re-use of waste heat from industrial processes for heat networks.</p>

Biomethane – we would welcome more clarity on the timeline for a biomethane policy given the potential opportunity in NI and the significant time that has elapsed since the call for evidence and the response to this.

EPCs & DECs

We agree with the comments supporting the Energy Performance in Buildings Directive, however, there has been emphasis on the use of Energy Performance Certificates (EPCs). There is a gap between predicted performance from EPCs and actual performance from Displayed Energy Certificates (DECs). The DEC is a much more accurate assessment of a building as takes into account the real performance of the building, taking into account the fabric, plant and operational management. It is considered a benefit to support the production and auditing of DECs. Actual assessment of the performance of building would benefit from focusing attention on the data collated from DECs.

UK and EU-led Regulation, Compliance and Reporting will undoubtedly do a lot of the heavy lifting in generating carbon reductions in this sector, however given that the NI economy has a higher composition of small and medium sized enterprises than the rest of the UK, government support to enable small businesses to decarbonise will be critical. We have provided a short review of the Northern Ireland-led policies and proposals below:

Fuel Switching to Natural Gas

We are supportive of the acknowledgement in the draft CAP that gas is a transition fuel, rather than the long-term solution.

Uplifts to Building Regulations in Northern Ireland and Further Building Regulations Uplifts

Since 2022, all new buildings in Northern Ireland are required to achieve a 40% reduction in carbon emissions compared to previous standards, through a combination of improved energy efficiency standards for building fabric and the use of low-carbon heating systems. Whilst uplifts in Building Regulations are planned in 2026/27, Northern Ireland has not yet set concrete long-term regulatory targets for buildings beyond that.

Construction skills

A major challenge is addressing the labour skills gap both in terms of numbers and skills for new low carbon technology. This may happen organically in response to rising demand for sustainable homes due to uplifts in building regulations. However, alongside the proposed uplifts in building regulations, we would welcome action to address opportunities as highlighted in the [NI Green Skills Action Plan 2025](#).

Carbon accounting skills - we would welcome a policy that supports the development of Carbon accounting skills across NI manufacturing and industry given the lack of skills available in the workforce. This will be critical in enabling NI PLC to differentiate itself and establish NI as a low carbon manufacturing destination.

	<p>Invest NI Energy and Resource Efficiency Programme / Invest NI Industrial Decarbonisation for Northern Ireland Project</p> <p>One of the current issues with the Energy and Resource Efficiency Programme is that the technical consultancy support is only available for businesses spending over £30k annually on energy and resources which precludes many small businesses. Given there are currently 80,000 registered SMEs in operation across Northern Ireland, along with over 70,000 micro businesses, more support is needed for smaller businesses with lower annual resource costs. Additionally, businesses supported by both of these programmes face challenges in implementing the measures recommended due to financial constraints, lengthy payback periods, and internal capacity constraints. So, whilst advisory and financial support is available, impact is currently limited. These challenges must be addressed when redesigning the programmes.</p> <p>Refrigerants – we agree with information regarding the Fluorinated Greenhouse Gases (F-Gases) Regulations within the draft CAP.</p> <p>We agree with comments made regarding the Combined Heat and Power Quality Assurance Programme within the Draft CAP and how the next steps will be led by DESNZ</p>
<p>Q8. To what extent do you agree with the proposed approach to achieving a just transition in the business and industrial processes sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree</p> <p>The Industrial Decarbonisation Programme and Energy and Resource Efficiency Programme led by Invest NI can help businesses reduce energy costs, which may protect jobs and competitiveness in the long term. If delivered well, this kind of support could help small and medium-sized enterprises (SMEs) and micro businesses to adapt to change without bearing the full financial burden. Similarly, proposed updates to Building Regulations could drive new skills and job opportunities in construction and green technologies, supporting employment in a low-carbon economy. We recognise that Invest NI's reach is currently limited to larger businesses, limiting its ability to support widespread change or ensure that all businesses, especially smaller ones, benefit equally from the transition. We would welcome similar support for SMEs and micro businesses.</p> <p>Given that manufacturing industries and construction represent 71.5% of emissions from this sector, there is little detail in the draft Climate Action Plan on how workers in these high-emitting industries will be retrained or supported as industries shift to cleaner technologies. Without clear funding, training programmes, or long-term workforce planning, there is a risk that these communities and sectors could be left behind.</p> <p>More inclusive engagement, stronger worker protections, investment in skills, and better access for marginalised groups will need to be addressed in the policies and proposals mentioned in the draft CAP, if Northern Ireland is to ensure a just transition in the business and industrial processes sector.</p>

	<p>One of the biggest challenges to industry and a major brake on NI's growth is the high cost of electricity. Significant growth and employment opportunities would arise, were NI to develop a coherent energy policy that focused on (a diversified) security of supply and made electricity more affordable for businesses.</p>
<p>Residential Buildings Sector Contribution to Carbon Budget 2023-2027</p> <p>Residential building emissions are primarily affected by fuel combustion for heating and the production of hot water.</p>	
<p>Q9. To what extent do you agree with the proposed policies and proposals to reduce emissions for the residential buildings sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives .</p>	<p>Agree</p> <p>We welcome the range of policies and proposals to decarbonise the residential buildings sector listed, with a couple of caveats:</p> <p>Affordable Warmth Scheme / Warm Healthy Homes Scheme</p> <p>The government policy to replace older inefficient oil boilers with more efficient oil boilers conflicts with Belfast City Council's ambition to reduce the number of households with Oil heating as a priority project in its Local Area Energy Plan. These households are often located in areas served by the gas grid (with lower associated emissions) and should be prioritised for heat pumps or hybrid systems. Important therefore, that the policy does not incentivise the continued use of oil boilers in urban areas.</p> <p>NISEP / Scale and Launch Energy Efficiency Programme</p> <p>Lack of finance is widely recognised in NI as a major barrier to the implementation of low carbon domestic retrofit. We would welcome a radical scaling up of NISEP into a domestic Energy Efficiency Programme that mirrors the breadth of support currently offered by SEAI in the Republic of Ireland and in retrofit programmes in GB. In addition, stronger market and fiscal incentives are necessary for private homeowners to renovate an existing property rather than demolish and build a new home, using financial levers such as those utilised in the RoI. This would require collaboration with HM Treasury to review tax incentives in this area, as the current VAT rules which exempt new builds from VAT whilst applying VAT to renovation works. Any revised home energy efficiency programme should be implemented in advance of any programme to support installation of low carbon technologies such as air source heat pumps.</p> <p>Clean Heat Market Mechanism</p> <p>Deployment of this policy must be carried out alongside energy efficiency improvements in the housing stock as heat pumps are more efficient and therefore effective in homes with an EPC of D or above. If they are installed in homes with lower SAP ratings the heat gradient may be too high for the technology to work effectively, resulting in cold homes, potentially leading to mould and damp, which would trigger scepticism in the technology. Policy safeguards must be in place to prevent this from happening. This mechanism must also take account of and not conflict with the opportunity to develop heat networks in built up areas that have a high potential for heat networks such as those identified in the Belfast Local Area Energy Plan.</p> <p>Gas Network Connections General Determinations 2023-2028</p>

	<p>This policy risks incentivising fossil fuel use, bypassing low carbon district heating, air/ ground source heat pumps and geothermal energy for residential heating. The sector summary on P106 lists fuel switching to natural gas first before mentioning support for low carbon heating technologies. The short-term emphasis on a transition to natural gas could risk undermine efforts to transition to genuinely clean energy as the majority of funding is diverted to the gas network instead of low carbon district heating, for example.</p> <p>Further Building Regulations Uplifts in Northern Ireland See previous comments recommending Northern Ireland to align to Scotland's strategic approach and ambitions. There is also an opportunity to strengthen Building Regulations to help increase tree cover and cut carbon emissions from land use. This can happen by encouraging the use of sustainably sourced timber, which is a low-carbon building material. By promoting low-carbon construction methods in new building regulations, government could boost demand for timber and support more tree planting.</p> <p>Behaviour change -feedback from Retrofit Hub members spells out a clear requirement for support for householders to ensure engagement in any retrofit works with proactive social housing providers reporting refusal rates of up to 50% of homes. Locally based one stop shop schemes are critical as a cornerstone of any residential retrofit programme.</p>
<p>Q10. To what extent do you agree with the proposed approach to achieving a just transition in the residential buildings sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Strongly Agree We support the proposed approach to achieving a just transition in this sector, recognising that lower income housing occupants are frequently affected more by the severe weather events and the health impacts of fuel poverty and poor air quality. There could be a risk of public backlash if people feel excluded from the benefits of the green transition, whether due to high costs or negative impacts such as rising bills or mould/damp from poor-quality retrofits. Means-tested grants could help to protect vulnerable households from unfair costs. Strong safeguards will be needed to ensure that energy efficiency measures are installed to a high standard. The provision of an independent one stop shop service would form the cornerstone of this approach. Members of the Belfast Retrofit Hub have highlighted that many residents are unaware of energy efficiency funding options, have limited understanding of various approaches which could make a difference to their homes. There is also a fear of rogue traders and wariness of paying for measures which are subsequently grant funded. Clarity on funding plans is essential.</p> <p>Policy clarity is also required around the Minimum Energy Efficiency Standards as this could have significant impacts on housing tenure. This is essential to inform investment by homeowners and landlords</p>
<p>Public Buildings Sector Contribution to Carbon Budget 2023-2027 Sector emissions primarily result from fuel combustion in public buildings for heating, cooling and hot water.</p>	

<p>Q11. To what extent do you agree with the proposed policies and proposals to reduce emissions for the public buildings sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Disagree</p> <p>Energy Management Strategy & Action Plan to 2030 & Energy Invest to Save Fund</p> <p>Progress towards the 30% reduction target by 2030 is slow, with a reduction of only 12% in carbon emissions by 2022. We recommend that councils are included in future government energy efficiency schemes. Although councils do not represent a large proportion of emissions in this sector they have an important presence in communities and should be seen to be leading by example in terms of energy consumption and best practice.</p> <p>The lack of progress in this sector may be attributed to four key barriers preventing the retrofit of public sector buildings happening at the required rate and scale:</p> <ul style="list-style-type: none"> • Limited capacity and expertise within public sector organisations to identify and implement projects • access to finance • long and complex procurement processes • risks associated with investing money with long term paybacks and no savings guarantees. <p>We therefore recommend that the Invest to Save Fund is either linked to complementary support, broadened to become a more holistic scheme which aims to support both specialist advisory costs (related to project appraisal and procurement of energy performance contracts) and the capital costs of energy upgrades. This scheme could be cross-sectoral, accepting applications from both public and private sector organisations, to reduce operational costs.</p> <p>As noted previously, there has been an emphasis on the use of Energy Performance Certificates (EPCs) however there is a gap between predicted performance from EPCs and actual performance from Displayed Energy Certificates (DECs). The DEC is a much more accurate assessment of a building as takes into account the real performance of the building including the fabric, plant and operational management. It is considered a benefit to support the production and auditing of DECs. Actual assessment of the performance of building would benefit from focusing attention on the data collated from DECs.</p> <p>Heat networks – it is disappointing that these do not feature more strongly in the Plan given energy modelling carried out in Belfast as part of its Local Area Energy Plan and recent feasibility work shows the high viability of heat networks in the region’s capital city. Connection of public sector buildings (which have a significant load) to heat networks is normally the first step on the critical pathway to building heat networks elsewhere. Policies that recognise the role of heat networks in the transition and their potential to balance the grid would therefore be very welcome. A specific support mechanism is urgently required to help develop heat networks and make them competitive with gas heating, in particular mechanisms to support/facilitate the connection of public buildings to heat networks. This will avoid the costly grid upgrades that would be required if all public buildings were fitted with individual heat pumps.</p>
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	<p>2012 and 2022 Uplifts to Part F (Conservation of Fuel and Power) of the Building Regulations in Northern Ireland</p> <p>We support further uplifts to Part F, but the current implementation timeline is slow. Many public authorities are already choosing to go beyond current building regulations, specifying higher standards such as BREEAM Excellent or Passivhaus for new public buildings. As public buildings constructed over the next two years will likely be in use for 25+ years, and retrofitting is significantly more expensive than building to higher energy performance standards in the first place, it is crucial that the government speeds up planned uplifts to Building Regulations to ensure Northern Ireland meets its net zero by 2050 target.</p> <p>Climate is considered throughout capital projects e.g. Design Teams are tasked to include SUDs, Whole Life Carbon Modelling, etc. There is an opportunity to champion the new design standard “Building with Nature” on council projects</p> <p>For both residential and public sector building emission reductions, there needs to be a joined-up approach for the built environment. As an energy mix is required for any net zero scenario, a place-based plan of NetZero 2050 should inform the planning now. Decarbonisation later on, could become even more challenging if we don’t have a joined-up approach. For example, urban dense areas have the opportunity to avail of heat networks, where these would be impossible in rural and urban sparse areas. Biofuels and electrification are the only real options for rural areas. Areas that have a gas network, can in the future avail of biomethane. With a future of limited quantities of each energy source, policies for promoting each of these decarbonisation technologies, should be targeted geographically, with a view of the energy landscape in 2050.</p>
<p>Q12. To what extent do you agree with the proposed approach to achieving a just transition in the public buildings sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives .</p>	<p>Disagree</p> <p>Given the influence at local level, it is important that public bodies are not left behind and are adequately supported to decarbonise their estates, with many having legacy buildings that require specialist retrofit expertise. Councils also have financial constraints hampering their ability to leverage new finance for capital improvements. Councils should be encouraged and supported, starting with including local authority estate management and climate representatives in policy design and implementation working groups to ensure their needs are met.</p>
<p>Waste Sector Contribution to Carbon Budget 2023-2027</p> <p>Emissions in the waste management sector include those released from waste disposal at landfill sites, wastewater treatment and waste incineration. The Climate Change Act (Northern Ireland) 2022 includes a requirement to recycle at least 70% of waste by 2030.</p>	
<p>Q13. To what extent do you agree with the proposed policies and proposals to reduce emissions for the waste sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree /</p>	<p>Agree</p> <p>Diverting Biodegradable Waste from Landfill</p> <p>We fully support the introduction of a policy that requires all homes and businesses to present biodegradable waste for separate collection, providing that this will be in line with any future DAERA Waste Management strategies, policies and legislation.</p>

<p>Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Achieve a 65% municipal waste recycling rate whilst reducing waste to landfill to no more than 10% by 2035</p> <p>The current approach to increasing recycling rates, which is largely focused on Local Authority Collected Municipal Waste will not be sufficient to achieve the next phase of recycling targets as the low-hanging fruit has already been harvested. A 65% municipal recycling rate will not be met without the inclusion of all commercial and industrial waste and there must be greater emphasis on statutory buy-in from this sector.</p> <p>To meet these targets, Northern Ireland requires clear strategic direction in the form of policy & legislation supported with adequate finances. This will set the foundation for investment and improved waste management infrastructure, aimed at delivering a more circular economy and less reliance on the vagaries of export-based markets.</p> <p>Introduction of Mandatory Recycling for Commercial and Industrial Sector</p> <p>We fully support mandatory business recycling as it would help achieve the '70% by 2030' recycling requirement in the Climate Change (Northern Ireland) Act 2022. A 70% recycling rate for Northern Ireland will not be achieved without the inclusion of mandatory targets for this sector.</p> <p>In addition, we highlight the need for improved data provision from the commercial and industrial sector to assist with waste projections and ensure compliance with waste legislation. This may be achieved through the government digital waste tracking system which is proposed for implementation in 2026 but requires expansion to include all commercial waste movements rather simply information from waste receiving sites.</p> <p>Increasing Household Recycling</p> <p>We support approaches that aim to promote enhancements in the quality and quantity of recycle to enable more local reprocessing, for example through best practice guidance, and funding to improve collection systems. However, this will not be enough to meet Northern Ireland's challenging recycling targets and the commercial and industrial sectors must now play their part in contributing to these targets.</p> <p>We also note that there needs to be recognition that the recent changes in law to packaging material (e.g. EPR and DRS) is likely to negatively impact the quantity and quality of recyclable material collected from householders across Northern Ireland. It is probable that this will result in decreases to the Local Authority Collected Household Recycling Rate. However, if central government projections are correct, then the environmental impact of the scheme should benefit NI as a whole.</p>
<p>Q14. To what extent do you agree with the proposed approach to achieving a just transition in the waste sector?</p>	<p>Agree</p> <p>There is likely to be a natural transition over a significant period of time from traditional treatment methods for "disposing of waste" to giving it proper recognition as a valuable resource. As the shift moves from treatments at the bottom of the Waste Hierarchy (e.g. waste incineration and disposal to landfill) to more favourable options such as</p>

<p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>reuse and repair, this should actually lead to the creation of more jobs and a highly skilled workforce across the waste industry, which over time will have a positive impact on the local economy.</p> <p>Whilst retraining of the workforce and educating children and young people through the curriculum are welcome measures, proposals may also need to be developed to build knowledge, trust and capacity of the broader population. If stricter recycling rules are introduced, they must be implemented with equity in mind. For example, ensuring recycling information is accessible to all and providing additional support and infrastructure where required, to ensure all communities across Northern Ireland benefit from the transition.</p>
<p>Agriculture Sector Contribution to Carbon Budget 2023-2027</p> <p>In agriculture the two main greenhouse gases are methane and nitrous oxide rather than carbon dioxide. Livestock emissions dominate greenhouse gases in the agriculture sector. Other key sources are from manure management, soils and emissions from off-road vehicles and machinery.</p>	
<p>Q15. To what extent do you agree with the proposed enabling actions to reduce emissions for the agriculture sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Disagree</p> <p>Agriculture</p> <p>Given that the agriculture sector is the largest emitter accounting for 29.1% of NI GHG emissions in 2022, with livestock emissions dominating, emissions from livestock must be significantly reduced. Rather than seeking interventions to address pollutants caused through over stocking, the pollution should be decreased at source by moving to more regenerative farming practices.</p> <p>The proposals throughout the CAP consistently ignore that farming practices are not sustainable, and the actions outlined are to minimise pollutants rather than reducing pollution at source. We note that technical solutions are not yet fully developed or tested, e.g. increased slurry aeration and novel slurry treatment systems. With the majority of cattle and pig manure stored as liquid slurry in NI, the CAP notes that through slurry aeration methane emissions can be reduced by approximately 40%. However, depending on the aeration system, aeration may increase ammonia emissions by approximately 20% which could have a significant negative impact on peatlands and human health.</p> <p>Since the majority of Northern Ireland's protected sites and priority habitats outside the designated site network currently exceed critical levels of nitrogen deposition and ammonia emissions, the statement that "this proposed action could increase the uptake of slurry aeration by 50% by 2027" is problematic. How can these proposals have passed the Test of Likely Significant Effects under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995? Note Annex H, the HRA states "Many of the proposals and policies in the draft Climate Action Plan were deemed to be positive or neutral to habitats sites, particularly those with would involve a reduction in NOx or ammonia emissions or reduced leaching of nitrogen from agricultural soils." This is in contravention of the statements above within the CAP</p>

	<p>and a review is required by the Department as the Competent Authority.</p> <p>Recommendation Approximately 73% of the world's natural grasslands used for pasture have been degraded due to overgrazing, resulting in lower-quality feed. The carrying capacity of land should be identified to assess sustainable livestock numbers on land taking into account soil type, hydrology etc. Livestock size and breed should also be considered, the move to larger, continental cattle breeds for example impacts soil structure and compaction.</p> <p>Annex F states The Farming with Nature Package will provide the opportunity for farm businesses to implement nature-based solutions. BCC welcomes this initiative but it needs to be adequately resourced to ensure farmer uptake. Clarification is required on how much funding will be allocated to this initiative and what is the target for area of land under the scheme.</p>
<p>Q16. To what extent do you agree with the proposed approach to achieving a just transition in the agriculture sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree Ensuring a just transition in the agriculture sector means recognising that not all farmers are equally positioned to adapt to climate policies. The Northern Ireland Integrated Farm Survey highlights that small farms often have older age profiles who may be nearing the end of their working lives. These farms may face the greatest challenges in adapting either due to limited financial capacity, lower uptake of new technologies, or reduced incentive to make long-term changes. Special provisions may be required in these instances, whether through tailored support, flexible timelines, or financial assistance, to ensure they are not left behind in the transition. We look forward to further detail on the Just Transition Fund for Agriculture and will reserve comment on this policy until the details of this scheme are published.</p>
<p>Land Use, Land Use Change and Forestry Sector Contribution to Carbon Budget 2023-2027 - The Land Use, Land Use Change and Forestry (LULUCF) sector covers emissions and removals of greenhouse gases resulting from direct human-induced land use, land-use change, and forestry activities.</p>	
<p>Q17. To what extent do you agree with the proposed policies and proposals to reduce emissions for the LULUCF sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Strongly disagree.</p> <p>Deliver the Forests for Our Future programme Annex F states “that sustainable forestry, including afforestation meeting the requirements of the UK Forestry Standard and open habitat restoration, is, by definition, a nature-based project.” This is an inaccurate statement as it does not meet the IUCN definition of Nature-based Solutions as set out in Section 8.5.</p> <p>Coniferous forests such as sitka spruce plantations are not nature based projects. They are intensive damaging activities and should not be included within the suite of nature-based solutions. Most of the afforestation across NI is coniferous forestry. The UK Forestry Standard – General Forestry Practice Requirements states Incorporate a minimum of:</p>

	<ul style="list-style-type: none"> • 5% native broadleaved trees or shrubs; • 10% of other tree species; • 10% open ground, or ground managed for biodiversity as the primary objective. <p>In forests of less than 10 hectares and in native woods, the above proportions may be relaxed, as long as the adjacent land provides landscape and habitat diversity.</p> <p>The above criteria does not meet the definition of NbS as set out in Section 8.5.</p> <p>A significant proportion of the existing forest estate, coniferous plantations, is on peatland or peat soils. To define or potentially categorise this land use as a nature project is deeply concerning. Peatlands are our largest natural carbon stores and it is important to slow and eventually halt greenhouse gas emissions from peatland through raising water tables, and removing planted trees. Clearly defined objectives for restoring degraded peatlands are required within the NI Peatland Strategy. The UK Strategy includes the outcome that 80% of heavily degraded peatland are under restoration management aimed at recovering long-term security of the ecosystem. Given that a significant percentage of the state forest is on peat soils, there is a major opportunity for DAERA to demonstrate leadership in restoring afforested peatland. Removing forestry on peat and restoring hydrology is key for both biodiversity and carbon wins.</p> <p>Recommendation</p> <p>DAERA should assess its current forest estate and look for opportunities to restore these peatlands. A clear commitment to conserve and restore state owned peatlands in advance of climate mitigation and adaptation goals is needed.</p>
<p>Q18. To what extent do you agree with the proposed approach to achieving a just transition in the LULUCF sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives.</p>	<p>Agree</p> <p>We are broadly content with the proposed just transition approach. We look forward to commenting on the just transition provisions in LULUCF policies and proposals which should incorporate relevant guidance from the Just Transition Commission.</p>
<p>Fisheries Sector Contribution to Carbon Budget 2023-2027</p> <p>Fisheries sector includes emissions from activities associated with sea fisheries, inland fisheries and aquaculture</p>	
<p>Q19. To what extent do you agree with the proposed policies and proposals to reduce emissions for the fisheries sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree /</p>	<p>Strongly Agree</p> <p>We fully support initiatives that prepare for roll-out of electrification and low or zero emission fuels across the fishing fleet. R&D to drive innovation is essential for this challenging sector however it makes up a relatively small proportion (0.1%) of Northern Ireland's total GHG emissions.</p>

Strongly disagree. Please provide your reasons and any alternatives	
<p>Q20. To what extent do you agree with the proposed approach to achieving a just transition in the fisheries sector?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Strongly Agree</p> <p>We are broadly content with the considerations outlined and look forward to reviewing the financial assistance and incentive schemes that will provide support to workers in the sector who may be negatively affected by climate policies. It is critical that government ensures collaboration with the fisheries sector to co-design decarbonisation policies that ensure no one is left behind or disadvantaged by the transition</p>
<p>Relates to Chapter 7: Impact Assessments</p> <p>Impact Assessment of the Climate Action Plan –</p> <p>Several impact assessments have been undertaken as part of the development of the draft Climate Action Plan. Individual assessments have been carried out for the policies and proposals across all sectors, with each assessment proportionate to the scale and likely impact of the respective measure. In addition, overarching impact assessments have been conducted to consider the cumulative effects of the draft plan as a whole. Where proposals are at an early stage of development, some impacts may not yet be fully identified, and these will be considered further as the proposals are refined.</p>	
<p>Q21. To what extent do you agree with the key findings of the Financial, Social and Economic Impact Assessments that have been carried out on the policies and proposals in the draft Climate Action Plan?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree</p> <p>The findings note there are short-term financial costs associated with implementing policies and proposals in the draft Climate Action Plan which are generally balanced by long-term financial gains. The co-benefits of climate action have been somewhat underplayed in this section; however we note climate benefits are discussed later in the document.</p>
<p>Q22. To what extent do you agree with the key findings of the overarching Financial, Social and Economic Impact Assessment of the draft Climate Action Plan?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree</p> <p>The summary fails to frame climate action as cost avoidance, treating the short-term costs of climate action in isolation, without comparing them to the much higher economic, social, and environmental costs of climate inaction. Cost avoidance is critical to justifying upfront investment. Also, there is no mention of intergenerational equity, acknowledging that climate action today helps avoid passing greater costs and risks onto future generations. Consideration should be given to the economic savings that can be made when climate mitigation and adaptation action is integrated e.g. retrofitting building to reduce carbon emissions and overheating at the same time, or delivering nature based solutions that reduce emissions from land use change as well as increase flooding resilience for communities.</p>
<p>Q23. To what extent do you agree with the key findings of the Equality Screening and Equality Impact Assessment?</p>	<p>Agree</p> <ul style="list-style-type: none"> • DAERA have presented a thorough analysis of data to support the Equality screening / EQIA. It highlights a number of major impacts

<p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p> <p>.</p>	<p>and/or gaps in understanding that will be monitored as part of its ongoing EQIA process.</p> <ul style="list-style-type: none"> • DAERA have screened in the NI Climate Action Plan, which is to be welcomed. This will ensure that equalities continue to be considered as part of the climate action plan. • We welcome the commitments on page 80 of the equality screening / EQIA which include developing “robust, outcome focused action measures, to identifying, addressing and monitoring the key inequalities [and to] monitor... and address key inequalities”. • We particularly welcome the statement that equality will be a cross-cutting theme and that there is a clear commitment to stakeholder agreement. We recognise the challenges involved in embedding cross-cutting considerations and look forward to working with DAERA as appropriate to make this happen. Community planning partnerships have been created in each of the 11 district councils, which are an important vehicle for local level engagement and delivery. • We await the further publishing of annual monitoring. Given the complexity and volume of data presented, it would be beneficial if this could be presented in an easier to understand way, as this will make it easier for stakeholders to enrich the data and improve collective understanding. • The screening states that the Climate Action Plan may have a major level of impact on people with disabilities. However, overall the consideration of disabilities, including the duty to promote positive attitudes or increase participation which have “not been scoped at this stage” would benefit from further detailed analysis. This should be a key consideration as part of the ongoing monitoring, engagement and cross-cutting commitment outlined in the screening / EQIA. The document states that “People with a disability experience climate change impacts differently and more severely than others. Their ability to adapt to future changes in our lifestyles, employment, transportation and new technology, which will be required to achieve net zero, may vary significantly. Equality impacts will be further assessed, and mitigation measures employed where appropriate as the strategy develops.” The identified impacts do not take into consideration transport and mobility which seems a key omission; whilst the residential element considerations also appear to be relatively light. • DAERA acknowledge that this is the first in a series of Climate Action Plans and, as many of the policies and proposals are still at an early stage, that some data / understanding of impacts, may not be known and states that “ Section 75 issues will be kept under review as the policy workstreams evolve, and equality screening will be undertaken as required on all related future policies/proposals as part of the normal policy development and implementation processes”. This is particularly important and is to be welcomed.
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	<ul style="list-style-type: none"> • Council stresses the importance of ongoing engagement as part of future implementation and delivery. This is crucial not just for successful delivery and partnership, but also to ensure that equality considerations are fully incorporated into ongoing planning and assessment. Whilst a digital first approach is appropriate, care must be taken to ensure wide participation and equal opportunity to engage. Given the complexities of climate change and the interdependencies, in-depth and focused consideration with target groups should also be deployed. In many cases, reliance on digital only methods such as Citizen Space will not be sufficient. There is limited evidence of pre-consultation which is usually recommended as part of EQIA. We recommend that on-going consultation with at higher risk groups as identified should be considered – not just as a one off at the start – this may be included as part of the Just Transition steering group. Often consultation (the appropriate type) will enable a better analysis of whether the equality duty has been met in substance, not just in form. • As part of this monitoring process, the importance of understanding the impacts on people with multiple identities, particularly in relation to poverty, should be considered. Whilst DAERA acknowledges the complexities of social identity, ongoing consideration (proactive identification, understanding and, where relevant mitigation) should form part of the EQIA monitoring process. Relying on the public consultation to identify impacts and undertake additional screening is not enough.
<p>Q24. To what extent do you agree with the key findings of the Rural Needs Impact Assessments that have been carried out on the policies and proposals in the draft Climate Action Plan?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives .</p>	<p>Agree</p> <p>The summary frames the impact on rural communities as largely positive but this depends on policies being well-designed so that they deliver new green employment in rural areas, improved sustainable transport opportunities, opportunities for rural communities to own renewable energy projects and opportunities for more sustainable agriculture practices all of which could lead to better economic prospects for rural communities. Climate policies must be designed so that they support rather than disadvantage rural communities. We look forward to reviewing the details of these policy proposals to ensure they deliver the opportunities promised.</p> <p>Belfast LDP policies support sustainable urban form which includes proximity principles of homes, transport and services, positive placemaking, connectivity and green and blue infrastructure and this in turn helps protect rural communities from unsustainable development that lock in high carbon emissions. Spatial planning principles and policies as contained in LDPs should be supported in this Climate Action Plan in order to ensure communities can reduce their carbon emissions through sustainable patterns of development.</p>
<p>Q25. To what extent do you agree with the key findings of the overarching Rural Needs Impact Assessment of the draft Climate Action Plan?</p>	<p>Agree</p> <p>We broadly agree with the findings of the overarching RNIA. We look forward to reviewing the mitigation measures mentioned to address adverse impacts on rural areas as part of the policies and proposals.</p>

<p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives .</p>	
<p>Q26. To what extent do you agree with the key findings of the Strategic Environmental Assessment?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Disagree</p> <p>We note the SEA statement that climate change mitigation and adaptation have been the key considerations when developing the plan. We would welcome further detail of how mitigation actions have included considerations of adaptation and more integration between the CAP and NICCAP3.</p> <p>We note the EPA's comments and would echo these that there are opportunities to consider how the impacts of climate change, individually and in combination, are likely to influence the implementation of the Plan. In this context, the Plan could consider opportunities to improve resilience of existing and planned critical infrastructure, systems and procedures to the effects and variability of climate change. This is not currently addressed in the draft plan and required further work alongside the NICCAP 3.</p> <p>There is potential for mitigation actions to enable maladaptation without proper consideration, for example in afforestation targets. Failure to safeguard proper adaptation measures in delivering the CAP would undermine efforts elsewhere to deliver climate adaptation, protect vulnerable communities and would avoid locking in financial burdens and increased vulnerability or missed opportunities to build adaptive capacity through this climate action plan.</p> <p>In addition to the above, vulnerable populations should be considered in the context of just transition / adaptation. The cascading effects of proposed mitigation and adaptation measures should also be considered. Recent extreme weather events could be useful to assist in identifying areas where for further work is needed to improve resilience, e.g. the resilience of critical water service infrastructure to flooding and drought.</p> <p>We echo the last paragraph of the summary, in which the SEA recommends close monitoring of policies and proposals set out within the draft Climate Action Plan to ensure that negative or unforeseen effects can be effectively responded to and managed. Mitigation measures should be included in these policies to prevent potential negative impacts from the outset.</p>
<p>Q27. To what extent do you agree with the key findings of the Habitats Regulations Assessment?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives.</p>	<p>Strongly disagree</p> <p>With the majority of cattle and pig manure stored as liquid slurry in NI, the CAP notes that through slurry aeration methane emissions can be reduced by approximately 40%. However, depending on the aeration system, aeration may increase ammonia emissions by approximately 20%. Given the significant negative impact of ammonia on peatlands and human health the statement that</p>

	<p>DAERA will encourage the increase in slurry aeration is deeply concerning.</p> <p>Since the majority of Northern Ireland's protected sites and priority habitats outside the designated site network currently exceed critical levels of nitrogen deposition and ammonia emissions, the statement that "this proposed action could increase the uptake of slurry aeration by 50% by 2027 is problematic. How can these proposals have passed the Test of Likely Significant Effects under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995? Note Annex H, the HRA states "Many of the proposals and policies in the draft Climate Action Plan were deemed to be positive or neutral to Habitats sites, particularly those with would involve a reduction in NOx or ammonia emissions or reduced leaching of nitrogen from agricultural soils." This is in contravention of the statements above within the CAP and a review is required by the Department as the Competent Authority.</p>
<p>Q28. To what extent do you agree with the key findings of the Regulatory Impact Assessment?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives.</p>	<p>Agree</p> <p>We agree the draft plan itself will not make any new regulations and therefore will not impose any costs, savings, additional compliance or administrative burdens on the wider business community.</p>
<p>Q29. To what extent do you agree with the key findings of the Children's Rights Impact Assessment?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives.</p>	<p>Agree</p> <p>We agree there is likely to be a net benefit to children and young people from the draft Climate Action Plan as it will deliver a cleaner, healthier and more sustainable environment whilst providing opportunities for the economy and job creation.</p>
<p>Q30. Can you provide any further information which will help to supplement the completion of these impact assessments.</p> <p>Please provide details, identifying the assessment to which the information relates</p>	<p>No</p> <p>Please details, identifying the assessment(s) to which the information relates: N/A</p>
<p><i>Relates to Chapter 8: The Natural Environment and Climate Change – Soil Quality, Biodiversity and Air Quality Targets</i></p> <p>The Act requires us to set specific targets for soil quality, biodiversity and air quality in this draft Climate Action Plan. The Act also requires that, where practicable, the policies and proposals should support and use nature-based projects, either individually or as part of wider action.</p>	
<p>Q31. To what extent do you agree with the proposed target for Soil Quality?</p>	<p>Disagree</p> <p>Soils</p> <p>The CAP states that "Good soil quality means that soil will function as a balanced ecosystem which sustains plant and animal life,</p>

<p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>whilst supporting provision of our food, filtering water pollutants and providing mitigation against flooding and drought. Soil health is a measure of how well our soils are performing these functions”. Yet the proposed actions are on nutrient inputs and are therefore inadequate to either assess or protect soil health upon which agriculture depends.</p> <p>We note that the plan states that NI is at the start of understanding the nutrient status of our soils and measuring nutrient baselines will allow NI to plan for steps needed to assist farmers and landowners to measure and improve soil health parameters. However, there are actions that can be taken now to improve soil health, most notably assessing stocking rates and where required reducing stocking levels. This is critical to reducing nutrients at source, poaching, soil compaction etc. Waiting until the 75% baseline is completed to set targets is neither ambitious nor prudent in terms of protecting soil health upon which agriculture is dependent.</p> <p>BCC welcomes the development of a soil health indicator project but would urge action should be taken in the interim to prevent further deterioration of soils. Determining sustainable stocking levels at farm scale should be prioritised. Soil health is key to the future of agriculture, so this is a significant risk to the agriculture sector.</p> <p>The importance of soil quality in mitigating against the impacts of flooding and helping us a region adapt to climate change should also be considered as part of any work to improve soil health.</p> <p>Recommendation Stocking density is a key issue impacting soil health through compaction, poaching and erosion and is not limited to nutrient levels and the associated pollution impacts. A comprehensive review of soil health is required, considering both climate mitigation and adaptation needs together in an integrated plan.</p>
<p>Q32. To what extent do you agree with the proposed target for Biodiversity?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Strongly disagree. At minimum, the CAP should contain an ambition to try to reach international biodiversity targets supported with adequate resources allocated to meet the targets set out in the forthcoming Nature Recovery Strategy. It is useful to note the recent OEP reports on pressures and drivers for biodiversity loss and the recent report on designated sites. DAERA need to implement all the recommendations within these reports.</p> <p>Nature based solutions There appears to be reliance on existing legislation and policy to address NbS but that is insufficient to integrate NbS within policies and proposals. The document embodies a strong business as usual approach but there is a need to consider opportunities to incorporate NbS into existing government programmes and investments to address Climate Change impacts and how this can be achieved.</p>

<p>Q33. To what extent do you agree with the proposed target for Air Quality?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Agree.</p> <p>The council notes that DAERA has indicated that the Department is considering the feasibility of implementing new regulations that would bring into operation tighter annual average limits / targets / objectives for PM₁₀ and PM_{2.5}, particulate matter having been identified as the most appropriate pollutant for incorporation into this draft Climate Action Plan. DAERA have advised that the main sources of ambient particulate matter in towns and cities come from industrial combustion, domestic combustion, and road transport.</p> <p>It is unclear, however, why particulate matter should have been identified as the most appropriate pollutant since the National Atmospheric Emissions Inventory '<i>Air Pollutant Inventories for England, Scotland, Wales, and Northern Ireland: 2005-2022</i>' publication identifies that principal emission sources of oxides of nitrogen (NO_x) within Northern Ireland also include energy industries, industrial combustion, residential, commercial and public sector combustion and road transport. Moreover, the 2021 World Health Organisation (WHO) Global Air Quality Guidelines publication recommends an annual mean air quality guideline value of 10 mg/m³ for nitrogen dioxide, in comparison to the current 40 mg/m³ annual mean objective, a 24 hour mean guideline value of 25 mg/m³ and retention of the 200 mg/m³ 1-hour mean guideline value. Belfast City Council presently maintains four Air Quality Management Areas across the city for exceedances of the 40 mg/m³ annual mean objective for nitrogen dioxide, associated principally with road transport emissions, with one of our AQMAs additionally declared for exceedances of the 1-hour mean objective for nitrogen dioxide.</p> <p>Notwithstanding, the proposed air quality target is that '<i>In 2025, DAERA will engage with other Departments and key delivery organisations, with a view to considering the feasibility of implementing new regulations that would bring into operation tighter annual average limits/targets/ objectives for PM_{2.5} and PM₁₀, in line with interim target 4 of the World Health Organisation Air Quality Guidelines 2021 of 10 mg/m³ and 20 mg/m³ respectively.</i></p> <p>We note that Scotland has already adopted a PM_{2.5} annual mean air quality objective of 10 mg/m³ (as a limit) to be achieved by 2020, a target for PM_{2.5} of 10 µg/m³ is to be met across England by 2040, and that a PM_{2.5} target is to be introduced for Wales by January 2027.</p> <p>DAERA will recall that Belfast City Council advised in response to '<i>Q1: Should there be legally binding targets for particulate matter, which are based on WHO guidelines?</i>' of the 'November 2020 DAERA Clean Air Strategy for Northern Ireland. A Public Discussion Document' that the Council would welcome further research and discussion by the Department into the introduction of legally binding targets for particulate matter for Northern Ireland, based</p>

on WHO guidelines, informed by an appropriate timescale, and prioritised actions for achievement of the targets.

DAERA will appreciate that whilst PM_{2.5} is not presently within the scope of regulations for the purposes of local air quality management, Part III of The Environment (Northern Ireland) Order 2002 places a statutory duty upon district councils to review and assess ambient air quality for those pollutants detailed within the Air Quality Regulations (Northern Ireland) 2003, including particulate matter (PM₁₀). No Air Quality Management Area is presently declared for PM₁₀ within the Belfast City Council boundary. Moreover, the annual mean concentrations for PM₁₀ and PM_{2.5} measured at the Belfast Centre AURN site during 2024 were 13 mg/m³ and 7 mg/m³ respectively, and the annual mean concentration for PM₁₀, measured at the Stockmans Lane Roadside site during 2024 was 18 mg/m³; below the DAERA proposed interim target 4 annual mean concentrations for PM₁₀ and PM_{2.5}.

However, Belfast City Council's 2023 LAQM Detailed Assessment for particulate matter (PM₁₀), fine particulate matter (PM_{2.5}) and nitrogen dioxide (NO₂) indicated that for a forward projection year of 2028, the highest particulate matter (PM₁₀), fine particulate matter (PM_{2.5}) and nitrogen dioxide (NO₂) annual mean concentrations within the Belfast City Council boundary are predicted to be 20.3 µg/m³, 13.1 µg/m³ and 31.1 µg/m³ respectively, typically within city centre locations where emissions from transport and combustion sources coalesce. These concentrations suggest that improvements will be required within the Belfast City Council area in order to achieve the proposed interim target 4 concentrations. It is considered therefore that further monitoring will likely be necessary across Belfast in order to accurately understand current ambient PM₁₀ and PM_{2.5} concentrations at relevant human health receptor locations. The council would consequently welcome publication of the recent audit of Northern Ireland Air Quality Monitoring Sites by Bureau Veritas.

Accordingly, it is considered that the introduction of regulations to meet the WHO interim target 4 for PM₁₀ and PM_{2.5} are a welcome and acknowledged improvement over existing ambient air quality standards, established via the 2007 Air Quality Strategy for England, Scotland, Wales and Northern Ireland, and Directive 2008/50/EC on ambient air quality and cleaner air for Europe, etc.

These interim targets 4 can however also be considered as an interim step towards full future alignment with the 2021 WHO Global Air Quality Guideline values. The WHO has recommended an annual mean air quality guideline of 15 µg/m³ for PM₁₀ and 5 µg/m³ for PM_{2.5}. The council would however welcome an analysis by DAERA of abatement options for PM₁₀ and PM_{2.5} emissions, having regard to the WHO Air Quality Guideline values, and taking account of local primary and secondary particulate matter and transboundary emission sources in any future feasibility study to inform the Clean Air Strategy for Northern Ireland.

	As an addendum to these comments, Belfast City Council would welcome publication of the DAERA Clean Air Strategy for Northern Ireland. Moreover, and as a consequence of the proposed Climate Action Plan targets for PM ₁₀ and PM _{2.5} , it is anticipated that various ambient air quality statutory instruments will need to be updated, including, but not limited to, the Clean Air (Northern Ireland) Order 1981, The Environment (Northern Ireland) Order 2002, the Air Quality Regulations (Northern Ireland) 2003 and The Air Quality Standards Regulations (Northern Ireland) 2010, etc.
Nature-Based Solutions to Reducing Emissions - Nature-based Solutions will create thriving habitats and ecosystems which reduce emissions, whilst also providing a landscape and marine environment which is more resilient to the impacts of climate change	
Q34. Can you provide any further information which will help us to incorporate Nature-based Solutions into our policies and proposals? Yes (If yes, please provide details) No	Yes The examples of NbS in the document are not ambitious and demonstrate there is a lack of knowledge across Government on what constitute NbS. Annex F states that “DfI undertook a review of its policy on grass cutting and verge management in 2022, placing a greater emphasis on environmental protection and enhancement. The revised policy will see a single swathe cut alongside roadsides twice per year. The revised policy endeavours to further increase the number of do not Mow Let it Grow sites and biodiversity enhancement projects on the NI road network.” Unfortunately, this inappropriate management is leading to the development of areas of rank grassland rather than species rich grassland contributing to pollinator objectives and wider biodiversity benefits. Inappropriate management is the wrong messaging and is unhelpful to organisations trying to ensure appropriate management and resource investment across their estate. It is also unhelpful in the drive to garner public support for operational changes which contribute to biodiversity. Within the recently secured Nature Town and Cities bid Breaking through Barriers to connect People and Nature, BCC will be developing guidance on NbS best practice and BCC would welcome input from DAERA on its development.
Relates to Chapter 9: Governance for Delivery Climate Action Governance Arrangements We will only meet our carbon budget if we can successfully deliver the policies and proposals we have identified. Achieving this will require ongoing commitment and prioritisation of this work, shared ownership and cross-departmental working, and appropriate levels of oversight and scrutiny to keep us on track. Managing this implementation process will mean establishing appropriate governance structures within government, creating new statutory oversight bodies and working in partnership with existing independent oversight bodies.	
Q35. To what extent do you agree with the proposed governance arrangements to support the delivery of the Climate Action Plan? Strongly agree / Agree / Neither agree nor disagree / Disagree /	Disagree Oversight Please consider bringing climate, economic, and just transition (social) dimensions together into a single Climate & Sustainability Programme, merging two programme boards into one. Just Transition Commission

Strongly disagree. Please provide your reasons and any alternatives	<p>Ideally the Just Transition Commission would have been established in time to work with and advise departments to inform the development of the draft Climate Action Plan to ensure that proposals, policies, strategies and plans comply with the just transition principle. Instead, it will only be able to provide an oversight review of the first Climate Action Plan rather than actively shape its development. Addressing inequality which is a key principle of the Just Transition will require integrated working across mitigation and adaptation.</p> <p>NI Climate Commissioner</p> <p>There is a risk of the roles of the NI Climate Commissioner and UK CCC overlapping. This relationship will have to be carefully managed to ensure the Climate Commissioner adds value beyond the existing functions of the CCC.</p>
<p>Relates to Chapter 10: Monitoring and Reporting</p> <p>Monitoring and Reporting on Policies and Proposals</p> <p>Monitoring and reporting on the implementation of policies and actions and the resulting impact on emissions reduction will be an essential element of tracking progress towards achieving the 2023-2027 carbon budget and meeting interim targets set for 2030 and 2040. We will ensure a robust monitoring framework is in place to keep us on our net zero pathway</p>	
<p>Q36. To what extent do you agree with the proposed approach to monitoring and reporting on policies and proposals?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Strongly Agree</p> <p>We agree with the proposed monitoring and reporting approach and have no comments to add.</p>
<p>Relates to Chapter 11: Public Sector Leading by Example</p> <p>Public Sector Leading by Example</p> <p>The public sector is critical to the successful delivery of the draft Climate Action Plan – influencing and enabling positive behaviours, driving change and acting as a leader on climate action and low carbon innovation. We are committed to forging a net zero pathway by delivering vital public services in a way that reduces emissions, reduces waste and uses scarce resources more sustainably</p>	
<p>Q37. Do you have suggestions about other actions that we should be taking across the public sector?</p> <p>Yes (If yes, please provide details) No</p>	<p>Yes</p> <p>We would welcome further opportunities for more integrated working across local and regional scales of government to ensure that locally led climate mitigation and adaptation is supported and enabled through this plan.</p>
<p>Relates to Chapter 12: Enabling the Transition to Net Zero</p> <p>Enabling the Change to net zero</p> <p>The draft Climate Action Plan sets out the importance of science and innovation, education and skills, infrastructure, planning, behaviour change and communication as enablers to delivering our pathway to net zero</p>	
<p>Q38. To what extent do you agree with the actions that we are taking to enable the transition to net zero?</p>	<p>Agree</p> <p>Behaviour Change and Communication</p> <p>There is a need for a national public awareness campaign for behaviour change for climate action that targets the adult population in Northern Ireland in the same way that previous high-profile campaigns led by</p>

<p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>other departments have led to widespread change. This must however be placed in the context of system change, rather than individual victim blaming i.e. encouraging behaviour change through enabling conditions rather than one off campaigns. Trust, capacity building and incentivisation can enable behavioural change across the system.</p> <p>As climate action is a cross-cutting executive level strategic issue, communication budgets from all departments could be pooled to increase resourcing and impact. As awareness campaigns and information are insufficient to bring about major change alone; they should be closely linked with other levers, including regulations, fiscal incentives and disincentives, and the development of sustainable infrastructure. Ultimately the sustainable behaviours must be comparatively cheaper and easier than unsustainable behaviours, in order to create lasting change.</p>
<p>Relates to Chapter 13: Investing in Climate Action</p> <p>Cost of Implementing the Climate Action Plan</p> <p>Delivering a cost-effective path to decarbonisation in Northern Ireland requires action across all sectors of the economy and a joined-up approach. Funding our net zero transition will be a collaboration between the public and private sectors</p>	
<p>Q39. To what extent do you agree with the assessment of the costs of implementing this Climate Action Plan?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree. Please provide your reasons and any alternatives</p>	<p>Disagree</p> <p>Government spending - The costs are set out in gross terms, i.e. government expenditure, rather than net costs. We would like to see the CAP investment costs set out as net costs and also as a % of GDP to understand if planned government investment commitments align with the level of investment recommended by the Committee on Climate Change.</p> <p>Costs should also be articulated in avoided costs of delivery of the plan versus current business as usual. Also avoided costs from the result of the plan supporting adaptation actions should also be included.</p>
<p>Q40. Do you have any other information to inform this cost assessment?</p> <p>Yes (If yes, please provide details) No</p>	<p>No</p>
<p>Just Transition Fund for Agriculture</p> <p>The purpose of this scheme is to provide advice and financial assistance to the agriculture sector to deliver its contribution to meeting the carbon budgets and emissions reduction targets by implementing proposals and policies to be included in Climate Action Plans</p>	
<p>Q41. To what extent do you agree with the proposed approach to establishing a Just Transition Fund for Agriculture?</p> <p>Strongly agree / Agree / Neither agree nor disagree / Disagree /</p>	<p>Agree</p> <p>We look forward to seeing the future Just Transition Fund for Agriculture. We support the shift to sustainable farming, but policies to reduce emissions in farming should be introduced gradually. It will take years, and in some cases decades, for farm management practices to change. If farmers are pushed to make too many changes too quickly, or if they feel unfairly impacted by the transition, it could lead to public opposition. While many farmers will be open to change, others may be</p>

Strongly disagree. Please provide your reasons and any alternatives	hesitant to make large investments or significant changes to how they farm. This needs to be reflected in the support, compensation, and timelines for implementing these changes.
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