

## Call for evidence and views on the Climate Change Bill

**Closes 15 July 2021**

Opened 20 May 2021

### Overview



Climate Change is one of the most important issues facing our society and how we address it could affect how we live, work and travel.

[The Climate Change Bill](#) that has recently come before the Northern Ireland (NI) Assembly sets out a framework to mitigate the effects of Climate Change in the coming years.

This includes reducing the amount of greenhouse gases released into the atmosphere and balancing the amount removed by our industries and through energy use.

The Bill proposes several mechanisms to help achieve its aims including establishment of Climate Action Plans across various sectors and regular reporting to monitor progress in terms of delivering the net-zero target.

## Why we are consulting

As part of the NI Assembly's normal legislative processes, the Climate Change Bill has been referred to the Assembly's Committee for Agriculture, Environment and Rural Affairs (AERA) for scrutiny and evaluation.

The Committee is seeking views from stakeholders on the objectives, proposals and potential consequences of the Bill so it can understand how the legislation could affect different parts of society and how effective it may be in achieving its aims.

Your views will help to inform the AERA Committee's consideration of the Climate Change Bill and any recommendations it may suggest as the Bill moves to the next stage of the legislative process.

## Consultation contents

You only need to answer the questions that are most relevant and important to you but we ask that you complete this response form in full, providing your views and making suggested amendments to the Bill where possible. If you are unsure as to how to answer a particular question, you may leave it blank.

### Tips for completing your response

#### **I'm not sure how to answer all of the questions.**

To help inform your views before completing your response, we recommend reading the [Climate Change Bill document first](#).

#### **Do I have to answer every question in the consultation?**

You are required to answer the consent question for publishing your response. The rest of the survey questions are optional. Please answer the questions that are most important and relevant to you.

## Introduction (Required Section)

Please note that in most cases **your written submissions will be published** on our website and may be quoted in the Committee's report or in Committee meetings (which are public and broadcast).

If you would like to request that your name not be included in what is published, or to request an alternative format to give comments, please contact the Clerk at the following email address: [Committee.AgriEnvRural@niassembly.gov.uk](mailto:Committee.AgriEnvRural@niassembly.gov.uk). We will consider all requests for information to be treated anonymously.

Please provide comment on any or all parts of the template. If you do not agree with a particular clause of the Bill, please consider suggesting how it could be amended.

### 1. How would you like your response to be published?

I would like my response to be published ☒

I would like to request my response not be published, and I understand this will only be accepted in exceptional circumstances ☐

If my request is turned down I understand that I can choose to withdraw my submission or agree to my response being published in full or as amended by me.

### 2. What is your name?

Guto Davies

### 3. What is your email address?

[gdavies@acenet.co.uk](mailto:gdavies@acenet.co.uk)

### 4. Please indicate if you are providing a submission as:

An individual ☐

On behalf of an organisation or business ☒

If on behalf of an organisation or business, please state its name:

The Association for Consultancy and Engineering

**And please tell us briefly how the organisation or business relates to the subject matter of the Bill:**

We welcome this opportunity to contribute to the net zero debate in Northern Ireland. We are the association for the UK's professional consultancies and engineering companies operating in the social and economic infrastructure sectors.

The Association for Consultancy and Engineering (ACE) champions infrastructure and the built environment to government and other stakeholders, representing the views of around 400 members. Our members employ over 60,000 in UK and 250,000 worldwide, contributing more than £15 billion to the UK economy. However, the buildings they create actively contribute over £570 billion a year of GVA.

The UK Government has committed the UK to cutting greenhouse emissions to net zero and in doing so is playing its part in capping global heating at 1.5 degrees, thus mitigating the worst effects of climate change. We welcome the opportunity to submit evidence to the Assembly Committee for Agriculture, Environment and Rural Affairs on this important issue.

Like all businesses, ACE members will need to change the way they work on a day-to-day basis. As the designers of the built environment, they are key to delivering the net zero society of the near future.

ACE members are dealing with the twin challenges of Covid-19 Recovery and the Climate Change Emergency. They are changing the way they work on a day to-day basis. As the designers of the built environment and supporting infrastructures, our profession is key to delivering the net zero society of the near future. We believe that ACE members collectively have accumulated a significant knowledge base that can support Government ambitions. We would be delighted to discuss how this can be brought to bear to support Northern Ireland address these twin challenges.

How we design, build, and operate our buildings and infrastructure are fundamental considerations for our sector. Changes in process, construction materials and technology will help us to deliver sustainable buildings which are net zero over their lifetime. Our Net Zero task force is engaged in systematically identifying best-practice from across the membership base. This will help us to collectively rise to this challenge and deliver on society's ambitious goals. Sharing innovation in the widest possible sense will help us to creatively respond to the challenge. This is also why the campaign is being delivered in partnership with ACE's sister organisation, the Environmental Industries Commission (EIC).

## Question 1: The Policy Objectives

The policy objectives of the Bill are to:

- Enable the mitigation of the impact of climate change in Northern Ireland;
- Establish a legally binding net-zero carbon target for Northern Ireland;
- Provide for the establishment and powers of a Northern Ireland Climate Commissioner and Northern Ireland Climate Office;
- Guarantee existing environmental and climate protections

### 1. What are your views on the overall policy objectives?

Mitigating the impact of Climate Change is a priority for ACE members in Northern Ireland. How we design, build, and operate our buildings and infrastructure will become the key consideration for our sector as changes in process, construction materials and technology will help us to deliver sustainable buildings which are truly net zero over their lifetime.

After twenty years of gradually increasing focus on climate change, the issue is finally receiving the urgency it demands, from both Government and the wider business community. However, the challenge of Net Zero is its absolute nature – it requires every part of the economy to make enormous changes, and these changes must not just be about reducing emissions, they must in most cases be about their complete elimination. For this reason, better national level policy is not sufficient, we need a new holistic approach to all levels of policy and all types of built environment projects.

We strongly urge members of the committee to consider our report on net Zero: ‘Are we ready? Delivering Net Zero in the built environment’. [are-we-ready-delivering-net-zero-in-the-built-environment-2.pdf \(acenet.co.uk\)](#)

### 2. Do you think that the Bill will meet these objectives?

Yes

☒

No

☐

Unsure

☐

Please give us a reason for your answer:

The Bill and its ambitions will go some way in delivering climate change objectives. We also know that wider engagement with ACE members and others will also be important in addition to legislative levers. We also believe that more can be done to meet many of the objectives before the target date.

## Question 2: Declaration of a Climate Emergency

- Clause 1 of the Bill legally declares a Climate Emergency in Northern Ireland.

### 1. Tell us your views on declaring a Climate Emergency in Northern Ireland.

How society responds to the Net Zero challenge is the biggest question of our time. We welcome the fact that, because of climate emergency declarations, the issue is finally receiving the urgency it demands, from both Government and the wider business community.

As well supporting the Government's declaration of a Climate Emergency, ACE has also urged its members to join the Pledge to Net Zero. The 'Pledge' has been established to commit organisations from the environmental sector to take a leadership role in the transition to a Net Zero carbon economy.

Pledge signatories commit to:

- Set and commit to deliver a greenhouse gas target in line with either a 1.5°C (encouraged) or well below 2°C climate change scenario – covering buildings and travel as a minimum.
- Publicly report greenhouse gas emissions and progress against this target each year.
- Publish one piece of research/thought-leadership each year on practical steps to delivering an economy in line with climate science and in support of net zero carbon. Alternatively, signatories may choose to provide mentoring and support for smaller signatory companies in setting targets, reporting, and meeting the requirements of the pledge.

## Question 3: Net Zero Target

**1. What are your views on the target set out in the Bill to achieve a Net Zero carbon, climate resilient and environmentally sustainable economy by the year 2045?**

How we work in a Net Zero future will be at the forefront of all industry leaders' minds, but with ACE members' day-to-day focus, and the huge expectations on carbon free infrastructure, buildings, and construction, we will have to work collaboratively. This is the same for the administration in Northern Ireland. It will only be by pooling talent, resources, and ideas that we will be able to solve the biggest challenge that society has faced in recent times.

With COP26 taking place in Glasgow later this year, there is a huge opportunity to demonstrate leadership on a global scale. 2045 is rightly an ambitious target, but we also believe that more can be done to meet many of the objectives before the target date.

**2. Do you think that the Net Zero emissions target is achievable?**

Yes ☒

No ☐

Unsure ☐

**3. Do you think that the timescale to deliver the Net Zero emissions target is achievable?**

Yes ☒

No ☐

Unsure ☐

**4. Do you think that the timescale outlined in the Bill to achieve Net Zero should be revised if circumstances change?**

Yes ☐

No ☐

Unsure ☒

Please tell us why.

The pace of change is challenging. Back in January 2020, the climate change emergency, and the commitment to net zero was at the forefront of policy development. With Covid-19 the immediate focus was public health, as virus-related legislation took priority. COP26 was delayed till late 2021 and to some extent work on climate change policy has slowed down. There have been calls from all quarters to make sure investment to rebuild the economy will also deliver on the challenges of climate change within Northern Ireland the focus of which is on protecting and renewing Northern Ireland's assets – its economy, places, and people.



## Question 4: Climate Action Plans

Clause 3 of the Bill requires the government to produce Climate Action Plans on a 5-yearly basis to achieve the Net Zero Target. The Climate Action Plans will:

- Have annual targets for net greenhouse gas emissions, water quality, soil quality and biodiversity
- Outline measures to achieve the target including carbon budgets and nitrogen budgets

### 1. Tell us your views on requiring the government to produce Climate Action Plans.

We support the idea of Climate Action Plans in principle. Climate breakdown is undoubtedly one of the most significant challenges. This Bill and other discussions on climate change have focused minds in the business world on what we can do to step up and create solutions that get us ahead of the target.

For the multidisciplinary consultancy sector, this is a tumultuous time. The crisis is on. Never before has there been such interest and urgent demand for the solutions we can provide, nor so much scrutiny on how we go about doing it.

### 2. Do you think the proposed Climate Action Plans are an effective way of delivering the Net Zero target?

- Yes ☒
- No ☐
- Unsure ☐

## Question 5: Office of a Climate Commissioner

Clauses 5 and 6 of the Bill provide for the establishment of an independent Office of a Climate Commissioner in Northern Ireland that will:

- Lay annual reports on progress made against the Climate Action Plans
- Make annual legislative reports on the effectiveness and appropriateness of the Bill
- Make recommendations about how the aims of the Bill are being achieved
- Have the power to request access to persons and documentation as required to discharge their duties

### 1. Tell us your views on the establishment of a Climate Commissioner.

In principle, we support the role of a commissioner to hold decision makers to account, but our contribution to this section of the Bill is limited at present. In Wales, ACE works with the Well-being of Future Generations Commissioner who also works in a similar way on climate change action.

### 2. What role and powers do you think the proposed Climate Commissioner should have?

As above.

## Question 6: Sectoral Plans

The Bill sets out that within the Climate Action Plans there will be specific policies and proposals in the following sectors to achieve the overall emissions target:

- energy production and supply (including for residential, public and district;
- heating and cooling purposes;
- transport (including shipping and aviation);
- infrastructure (including infrastructure for electric vehicular transport);
- business and industrial processes;
- residential and public (in relation to buildings in these sectors);
- waste management;
- land use and land-use change, including forestry; and
- agriculture

### 1. Do you agree with the proposal to have specific sectoral policies associated with the Climate Action Plans?

Yes

☒

No

☐

Unsure

☐

### 2. What impact do you think that these sectoral plans will have in terms of helping to achieve the Net Zero target?

We support sectoral plans in principle but await further detail. Sectoral plans and the impact of investment in our built environment is shaped by national policies and regulations, but also by the approach taken at a project level by designers, consultants, contractors, and clients. To be ready to deliver a Net Zero built environment, we need both these elements – the national and the project-specific – to work in tandem.

Different obstacles appear in different sectors, but none are truly ready for what lies ahead. Some of this is due to cross-sectoral issues. Net Zero is a unique challenge that does not always sit well with existing policy approaches, while attempts to retrofit carbon control into existing policy tools such as Environmental Impact Assessments (EIAs) have not always been successful.

At national level we need a revised framework for assessing which projects should be prioritised as we transition to Net Zero. This framework needs to extend to the regional planning level, so that as we roll out regional approaches to decarbonised heat and transport networks and integrate carbon capture and storage (CCS) industrial clusters, we can ensure that our built environment investments are compatible with this.

### 3. How do you think the above sectors might be affected by the proposals?

At programme level we need more clarity on what we are aiming for – for example, what Net Zero means at project level. We also need to make sure that new initiatives aimed at transforming the way the construction industry operates have Net Zero at their core.

The role of the consultancy sector is central, and it will need to mobilise its unique capabilities to help clients understand what Net Zero means, what it involves, and to design the projects that will enable a Net Zero built environment. This will involve developing new business services and upskilling employees.

For the multidisciplinary consultancy sector this is a tumultuous time. Never before has there been such interest and urgent demand for the solutions we can provide, nor so much scrutiny on how we go about doing it.

That scrutiny comes from within – our people want us to be doing the right thing, to be on the right side. It also comes from the public – people are expecting urgent and effective responses, not only to the climate emergency, but to the biodiversity crisis also. It also comes from our clients – they want to be working with trusted advisers, to come up with ambitious, globally leading, low carbon solutions and programmes that will bend down the national emissions curve, getting us to net zero.

Estimates vary slightly, but there is consensus that the construction, operation, and maintenance of the built environment accounts for between 40 and 45% of total UK carbon emissions. So, as multidisciplinary consultants enabling a more sustainable built environment that allows nature and communities alike to flourish, we have a lot to do.

To assist those impacted by net zero targets, such as SMEs, the ACE and EIC Net Zero group have jointly created an SME guide designed to give SMEs who are not carbon specialists the insight and tools to prepare their business for upcoming market changes that Net Zero is driving. It will help businesses working in the environmental business and built environment sectors meet changing client expectations while grasping the new business opportunities created by the move to a carbon free future.

## Question 7: Resource Implications

### 1. What do you think the resource implications of the Bill will be for:

The Department of Agriculture, Environment and Rural Affairs

N/A

The Northern Ireland Executive

N/A

Specific sectors of the Northern Ireland economy

**2. What do you think are the most important issues for the government when making funding plans to help achieve the aims of the Bill?**

We would welcome the opportunity to liaise with the Government when making funding plans to ensure the views of our members are considered.

## Question 8: Access to Specialist Advice

The Bill proposes that the UK Climate Change Committee (UK CCC) will provide advice to the Commissioner when they report annually against the Climate Action Plans.

### 1. Do you think that this is appropriate?

Yes ☐

No ☐

Unsure ☒

### 2. Are there other sources of expertise that may be needed to inform progress to achieve the Net Zero target?

In January 2020, business leaders from (ACE) and Environmental Industries Commission (EIC) joined forces for a new campaign to analyse how we can redesign UK infrastructure to enable us to reach Net Zero by 2050. We would welcome the opportunity to engage with relevant departments to achieve the net zero target.

## Question 9: Responsibility on Public Bodies

The Bill places obligations on a wide range of organisations to help achieve the emissions targets and it will influence policy across a number of public Departments. This includes introduction of a scheme to track carbon usage that will be overseen by the Department of Agriculture, Environment and Rural Affairs.

**1. What are your views on the roles and responsibilities placed on public bodies as set out in the Bill?**

N/A

**2. Do you think that there should be a lead responsible government Department for delivering the aims of the Bill?**

Yes ☐

No ☐

Unsure ☒



**3. If you think there should be a lead Department, please tell us which one and why:**

Department for Agriculture, Environment and Rural Affairs ☐

Department for Communities ☐

Department for the Economy ☐

Department of Education ☐

The Executive Office ☐

Department of Finance ☐

Department for Health ☐

Department for Infrastructure ☐

Department for Justice ☐

Why do you think this government Department should be responsible?

In principle, all departments should be working collaboratively on this issue. ACE members would of course be working closely with the Department for the Economy.

**4. What are your views on the implementation of a carbon usage-tracking scheme?**

N/A

## Question 10: Transboundary Considerations

### 1. What are your views on how the Bill addresses transboundary issues in relation to Climate Change?

Climate change knows no boundaries; therefore, it is vital that transboundary issues, and indeed solutions, are taken into consideration as part of this Bill. Right across the UK, ACE is working with stakeholders to deliver net zero.

In January 2021, the Scottish Government shared an updated roadmap which outlines more than 100 new policies and proposals to support green recovery in Scotland. The move followed ACE sharing bespoke research on Net Zero with Michael Matheson MSP, Cabinet Secretary for Transport, Infrastructure and Connectivity.

ACE is also working with the Construction Leadership Council (CLC) on a major new campaign to ready the construction industry to decarbonizing the built environment. The campaign, called CO2nstruct Zero was launched in March 2021 and is described by the CLC as "a cross-industry change programme to drive carbon out of all parts of the construction sector, from manufacturing and design to construction and operation of assets".

On an implementation level, it is important that the Bill takes into consideration the different operating models right across the UK and the impact this might have on ACE members and others.

On links with the Republic of Ireland, it is essential that the NI Government collaborate closely with whatever interventions are planned in that jurisdiction such as more sustainable travel, EV infrastructure, energy interconnectors. Many of these interventions will require close cross-border cooperation.

### 2. Do you think that there should be a transboundary approach to Climate Change?

Yes ☒

No ☐

Unsure ☐

## Question 11: Rural Impact Assessment

**1. Do you think it is important to assess the impact on rural communities of the proposals provided for in the Bill?**

Yes ☐

No ☐

Unsure ☒

**2. What do you think is the best way to consider the potential rural impacts?**

N/A

## Question 12: Additional Information

**1. Are there any other measures not included in the Bill that you think should be included?**

Separate to the Bill, but still relevant to the issue of climate change are the Building Regs in Northern Ireland. These regulations are nearly a decade old, especially in relation to energy efficiency, compared to GB and Ireland. A priority must be to update these urgently.

**2. Do you have any other comments you would like to make about the Climate Change Bill?**