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Ulster Wildlife Response to the Green Growth Strategy Consultation

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Overall, Ulster Wildlife welcomes this strategic approach to setting out the Government's vision for Green Growth. Given that a Climate Emergency situation has been declared we see this as a high priority document and urge moving forward with the strategy as soon as possible.

We particularly welcome the inclusion of the views and aspirations of young people being included in the strategy. We are content that the 10 overarching executive comments represent a broad aspirational vision of a green future. We also welcome and are supportive of the Government highlighting front-loading decarbonisation targets.

However, there are some wider issues throughout the document which are of broad concern to us and some more specific issues which we feel are misrepresentations of the actual position and which need re-presented.

In particular, we feel the document fails to highlight the importance of:

- Nature-based solutions,
- Nature Recovery Networks and the reversal in the decline in biodiversity
- Water quality and Blue Carbon retention
- Land use and Land Use Change-with particular reference to the potential for carbon gains from peatland restoration and tree planting.

These specific points require further consideration in a final strategy:

1. *Biodiversity.* Although the importance of biodiversity in delivering a greener, more climate resilient future is mentioned early on in the document, overall and throughout the rest of the document there is very little mention of biodiversity and how it might be enhanced from the current critically low level. This needs to be balanced and happen in tandem so that action against the two crises are supportive of each other, and not in contradiction, which is a risk if not done well. Understanding how the incoming Environment Act, and the Environmental Improvement Plan (EIP) - which will be captured in the NI Environment Strategy - will work alongside the Green Growth Strategy is crucial. Strong links must be made between both strategies.
2. *Decarbonising.* On the occasions it is mentioned as one of the High Level Green Growth principles (eg p15), decarbonising is only assumed to be replacing fossil fuels with renewables. However,

part of
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reducing emissions from peatlands and high organic matter soils is a form of decarbonisation which, with already proven restoration technologies, will help reduce carbon emissions and, if followed up by appropriate management practices, will start to sequester carbon from the atmosphere.

3. *Water*. There is no mention of our aquatic resources, either coastal, marine or freshwater. Water is the most defining feature of the terrestrial landscape in NI. There are significant water quality issues which need to be addressed and these have a huge impact on our health, food production and biodiversity and addressing water quality must be a significant consideration within any Green Growth Strategy. The sustainable management of our marine and freshwater resources have a major bearing on coastal and offshore biodiversity as well as offering significant health (food nutrition) and commercial (recreation, fishing) benefits.
4. *LULUC*. We support the delivery of a Land Use Strategy based on alignment with current habitats and targeting areas where restoration or changed management will realise maximum biodiversity and carbon benefits while recognising the need for high quality, sustainable food-production from our farmland. A Land Use Strategy will also support delivery of Nature Recovery Networks (and represents cross-strategy working between Green Growth and Environment Strategies - executive level strategies, as well as the incoming departmental strategies such as the Future Agricultural Policy Framework and Biodiversity Strategy).

Questions for response

Section 1

Q1 - Is our Vision 2050 the right vision? If not what would you change?

Overall, Ulster Wildlife welcomes this strategic approach to setting out the Government's vision for Green Growth. Given that a Climate Emergency situation has been declared we see this as a high priority document and urge moving forward with the strategy as soon as possible.

We particularly welcome the inclusion of the views and aspirations of young people being included in the strategy. We are content that the 10 overarching executive comments represent a broad aspirational vision of a green future. We also welcome and are supportive of the Government highlighting front-loading decarbonisation targets. The Vision statement is broadly right though we feel the word ecosystem is misused. It should be ...with a healthy range of ecosystems... Also, given the urgency of the situation, simply stating that we will be on a "path to recovery" by 2050 is much too nebulous a phrase, we need to have recovered by then. We therefore believe that there should be further ambition in the Vision. We also believe that 'resilience' is the key phrase - 'Green Growth' cannot always mean strong economic growth, due to the challenges of climate change and extreme circumstances that flow from this following, for example, severe weather events - but fostering resilience is vital to ensure continued health and wellbeing of society.

Q2 - Are our Green Growth principles right? If not, what should be included / taken out and why?

Broadly right though decarbonising is only assumed to be replacing fossil fuels with renewables. However, reducing emissions from peatlands and high organic matter soils is a form of decarbonisation which, with already proven restoration technologies, will help reduce carbon emissions and, if followed up by appropriate management practices, will start to sequester carbon from the atmosphere. The document should refer to Nature based solutions, Nature Recovery Networks and the reversal in the decline in biodiversity, water quality and Blue Carbon retention.

While not an issue in principle it could be disastrous if precaution was not practised. This is mentioned vaguely on page 15 "We need to integrate decarbonising and environmental principles into policy making. This will require us as Ministers having a duty to take account of environmental principles when making or revising policy, in the same way as proposed for all UK Ministers in the UK Government's response". We feel this should be more strongly enforceable and the term used should be "embedding environmental principles" rather than just "taking account of..."

Furthermore, the UK Environment Act, once commenced in Northern Ireland, sets out five important environmental principles:

- the principle that environmental protection should be integrated into the making of policies;
- the principle of preventative action to avert environmental damage;
- the precautionary principle, so far as relating to the environment;
- the principle that environmental damage should as a priority be rectified at source, and
- the polluter pays principle.

Schedule 2 of the UK Environment Act requires DAERA to prepare, consult on, and lay in the NI Assembly a policy statement on the interpretation and application of these environmental principles - this must be embedded in the Green Growth strategy and its outworkings. If NI is to make progress for current and future generations, it is important that politicians and civic leaders take the green growth principles seriously and lead by example and take these into account when determining impact for future generations

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Section 2

Q3 - Are we right to adopt a Green Growth approach bringing together green jobs, climate action and the environment?

Yes indeed, though The section on *what green jobs are* (p27) omits to mention-

- the recycling sector where there is huge opportunity to improve recycling rates and quickly reduce production-based emissions. As one of the High Level Green Growth principles - *Reduce our wasteful use of resources*-there is a recognition of the importance of sustainably using our resources and recycling is the cornerstone of this principle.
- There is also considerable merit in demonstrating positive environmental action and green jobs should encompass nature - positive initiatives and nature based solutions.
- Restoring biodiversity, setting examples for habitat restoration and sustainable management encompassing education, training and firm and strident advocacy for wildlife will create a significant tranche of jobs loosely termed as in the "Conservation" sector
- Global companies are increasingly using such opportunities to demonstrate a commitment to the environment and highlight their environmental ethics and leadership. In addition, progressive companies are seeking to look for net zero supply chains and green skills will therefore be a fundamental part of the future in all industry sectors.

Q4 - Is a statutory Green Growth test needed to ensure we put climate action, environment and green jobs at the heart of policy development?

Yes, but will it just be statutory in existence or will its recommendations have strong powers of enforcement? Put simply, what teeth will the Green Growth Test have? Will it be able to block developments if proven to be unsustainable or in contravention of government climate resilience policy? To be effective it needs to be properly enforced. It is not clear what the Green Growth test is testing for- is it the GG principles themselves? Whilst some of these are not measurable we can see benefit in applying a metric to those which are quantifiable in delivery. Also, applying the Green Growth Test to policy would imply that the policy has already been drafted and is merely being appraised? The Test should be more embedded in the policy development process already as well especially as p.28 refers to 'duty to consider' how adverse impacts might then be reduced.

Q5 - Should Green Growth be one of our top Executive investment and budgetary priorities?

Yes, but it will probably always lag behind Health and Education until it is realised that climate is a cross-cutting issue and its emergency status means that it will have severe implications in all sectors of society

and daily life – including health and education sectors. Therefore it should be the highest government priority but spread across budgets profiles for all departments. We cross refer to Table 2 on page 5 of the Exec Summary of the recently published Fiscal Commission report [Fiscal Commission Northern Ireland - More Fiscal devolution for NI Executive Summary \(fiscalcommissionni.org\)](#). This shows that for every £100 spent on the environment in the UK as a whole, in NI we only spend £81 whereas, by comparison, we spend £343 for every £100 spent on agriculture, fisheries and forestry. We feel this shows starkly that much more priority needs to be given to funding for the environment by the Executive.

It is also vitally important that innovation, R&D and technology transfer is adequately supported and funded to consolidate and accelerate the net zero pathway.

Section 3

Q6 - Do we need specific targets for each sector set out in Climate Action Plans? If yes, how would this be brought about; and if no, how should we ensure we drive change?

Yes, we need specific targets with strict timelines and allocated budgets. These should have an underpinning science base where possible based on encouragement and incentive rather than just enforcement (as per p18 of the draft Strategy). There is no indication of who will drive and coordinate these Climate Action Plans and we would stress the need for proper stakeholder engagement in developing and monitoring progress. Stakeholder engagement must include public, private and third sectors, as well as citizens (including young people).

Q7 - Do you agree on the definition of the sectors?

The scope of the sectors (p39) should cover food production and processing. Within these sectors the production of beef, dairy, pork and chicken is much higher per capita than elsewhere in the UK. Government investment over time has often encouraged high volume/low margin low skill, labour-intensive businesses which will become increasingly unsustainable in a food production system which needs to move towards net-zero emissions and a challenging labour market position given current political realities. The Green Growth Strategy must recognise there will need to be some re-balancing coupled with achieving more efficiency and embracing innovation in sustainable livestock production and land management to move to an optimum level of sustainable future food production in light of our climate commitments and a need for food security.

Section 4

Q8 - Do you agree with the adoption of a Just Transition approach? If not, what approach should we be taking and why?

We strongly agree, particularly with the inclusion of the rights and interests of young people being included in the strategy. There are numerous excellent examples across the British Isles of firm adoption of a Just Transition approach and we would particularly refer to the Republic of Ireland's efforts in shutting down large-scale commercial peat cutting activity.

Q9 - How do we ensure this Just Transition - is a Commission the right way forward?

Yes, provided it has statutory underpinning and legal power of enforcement and is adequately resourced to fulfil its primary purpose.

Q10 - How do we make sure the public and all stakeholders (including young people) are actively engaged with Green Growth? Is a Citizen Assembly Panel the right structure?

The foundations for a green revolution lie in the education sector so we must start from the very bottom up to ensure that school syllabuses etc are built around your 10 core principles. Fundamental to the delivery of the whole strategy is the sentence "Listening to and **acting on** the views of young people is a must for the success of this Green Growth Strategy". We would like to see some evidence on how the **acting on** process will be implemented. We know from our experience with the Grassroots Challenge programme that working with thousands of young people across NI can quickly build momentum and deliver behavioural change on climate, biodiversity and green growth issues. Continuity of funding and

a commitment from Government has been the challenge and the primary barrier to progress. This needs to be addressed.

Section 5

Q11 - How can we work most effectively with businesses, local government and organisations across Northern Ireland to maximise and deliver our decarbonisation and Green Growth efforts?

Note our comment on what we consider the scope of decarbonisation to cover (Q2 above) and the need to incorporate Nature based solutions, Nature Recovery Networks and the reversal in the decline in biodiversity, Water quality and Blue Carbon retention AND the need to underpin these with a Land Use Strategy.

Capacity building with businesses is also of key importance particularly given the predominance of SME's in NI. To remain competitive in a changing external environment and build resilience and opportunity, businesses will require support to successfully transition to their new operating environment.

Q12 - How should the public sector be leading by example on Green Growth?

Firstly, the public sector should put its own estate in order and, where appropriate, act as a broker in the development of key public services which would accelerate the journey and clearly demonstrate commitment, ambition and leadership. Public sector procurement presents a significant opportunity to implement Green Growth principles with procurement expenditure accounting for some £3bn annually, representing a quarter of the NI Executive's budget.

The public sector should also act as an exemplar for best practice across all the land use sectors embraced in what is a substantive area of land (including state forests and waterways). We feel that the *role Local Government* can and must play in delivering the strategy, is very weakly covered in the document.

Q13 - What indicators should we use to measure the success (or otherwise) of our Green Growth strategy?

Monitoring and progress can only be measured if set against robust baseline data. We fully support the need for baseline data to underpin decision making. However, by assuming the CCC as the primary source of evidence, the unique individuality of the environment in NI is not fully represented or presented in the CCC data sources. The Standing Committee on Climate Action should be responsible for the agreed monitoring framework. Consideration should be given to using a *Social Progress Index* as a measure of progress. The Executive as a whole must follow this up with monitoring and measuring the success (or otherwise) of the more detailed sectoral plans which are referenced in the document. Monitoring must be underpinned by a sound scientific basis and have the necessary funding ring-fenced.

Q14 - How can there be effective oversight of Green Growth - should there be a dedicated Assembly Committee, or independent scrutiny??

Due to the anticipated close involvement of MLAs in all aspects of the Green Growth Strategy, we favour independent scrutiny with an agreed monitoring framework. However its role must be underpinned by legislative enforcement powers for it to be effective and there should be public input to the selection process for the scrutiny body. We see the need for an accountability framework to be developed and used as a foundation for Independent scrutiny and we recommend that any scrutiny should include the application of a Social Progress Index.

Section 7

Q15 - Please add any other comments or suggestions you think are relevant to developing and delivering our Green Growth strategy.

- We note the reference to the current climate change bill debate. Much of the report leans towards the CCC route of 82% emissions reductions by 2050 for NI within the UK (as per the 2008 UK Climate Change Act). It is not made clear what situation which might emerge if neither Climate Bill makes it through Parliament before the dissolution of the Stormont Executive next May. This might impinge on the second of the Executive's Commitments "*Legislating for Change*"- where the aspiration is to achieve net zero emissions by 2050 (which is somewhat at odds with the other narrative in the report). Even in the absence of a Climate Bill, there will still be Climate Action Plans drawn up by 2022. These will be based on CCC recommendations and will likely be somewhat at odds with the commitment in *Legislating for change*.
- The *Where are we now* section is helpful and well laid out though to say that NI reductions 1990-2019 at 18% are "somewhat less" than the 45% for Scotland (p33) is underplaying how serious and urgent the NI position is and glosses over the fact that NI has a huge amount to clawback in relation to other regions of the UK
- *Evidence based decision making* (p48). We fully support the need for baseline data to underpin decision making. However by assuming the CCC as the primary source of evidence, the unique individuality of the environment in NI is not fully represented or presented in the CCC data sources. Green capital in the countryside needs quantified.
- *Tree planting*. Planting 18 million trees may sound good (p17), but in reality that only represents approx. 9000 ha at current standard forestry planting densities. This is only 0.75% of our land area. We already have the second lowest tree cover in Europe (8%), we lag significantly behind the European average of 32% and yet we have the climate and soils ideally suited to tree growth. So we need much more ambitious tree planting targets - to 10% land cover at least, and ideally with a wider range of tree species trees planted more imaginatively than at present and integrated more innovatively into our rural and urban landscapes. This is one area we can make relatively rapid and significant gains towards redressing our emissions balance.
- *Innovation* (p52) There is no mention of farming or food production, or for innovation in the management of habitats to maximise climate resilience and carbon storage. Also, one of the examples cited under "Within departments, strategy, policy and programme development to support Green Growth ---a future agricultural policy" needs much more thought and amplification. There is a strong emphasis on innovation in the document. A lot of this is aspirational and alongside innovation we should invest in already proven technologies and mitigation measures-many of the Nature-based solutions- e.g. on peatland restoration, water quality initiatives, tree planting etc. The document is very light on these.
- *Case studies and examples*. In the section of the document given over to case studies and examples, all of these are of commercial companies generally implementing high-level technology. None of the examples given has any reference to biodiversity or indeed to nature-based solutions to deal with, for example GHG and ammonia emissions. While these are very laudable examples, we feel they do not represent the spectrum of opportunities available for nature-based, green growth solutions.
- *Emissions Trading Schemes*. (p 64). While these do have real value, there is a risk that they can be used by major corporates to "greenwash" their activities and displace environmental damage to other countries for example. We do not see sufficient safeguards in the document to curb activities such as these or addressing inherently serious emissions profiles from the agricultural and transport sectors. This is of particular concern for example to the farming sector where the move to net-zero carbon is being developed, carbon storage and sequestration is being encouraged - and indeed publicly funded, with no guarantee where those credits will be realised.

Conclusion

- If NI is to be sustainable, as self-sufficient and carbon neutral as possible, careful thought and planning needs to be given to the needs of future generations and the strategies and policies

that will guide the way to a successful future. Globally all countries should be progressing along the net zero journey and this will bring challenges and opportunities. Within this journey there will be droughts, wildfires, floods, food shortages, economic and health challenges (as already highlighted by the World Health Organisation and UN). Sound decision making is needed that looks well beyond 2050 since the decisions taken today will have intergenerational impact. Immediate action is needed to start this journey. However this needs to be built on solid foundations with a well- developed evidence base. The science of climate change is irrefutable however the evidence base and methodologies underlying the net zero pathway is evolving and this needs careful consideration to ensure the best strategic fit is applied, delivering the best possible outcomes for NI addressing current and future needs whilst playing our part in addressing a global issue.

- Behavioural change will be required from all sections of society. Mitigating food insecurity and the dangerous effects of climate change are the two biggest challenges facing humanity today. ([Consumerism and Climate Change: How the Choices You Make Can Help Mitigate the Effects of Climate Change | United Nations](#)). The UN highlights that in providing future food security, the global population faces many challenges with little room for compromise. If food production is to grow by 60 to 100 per cent in line with population growth and we are to limit the anthropogenic impact upon the environment, food production must be achieved without further land expansion or an increase in greenhouse gas emissions. Means to provide future food security must utilise and improve existing resources, including reducing food waste, sustainable intensification and healthier diets. Reliance on imports is also a dangerous way to plan for the future and smart, well considered decisions are required for all industry sectors especially for perishable goods.
- Fostering resilience - this is a key aspect of the 2050 Green Growth vision. We fully support this and consider enhancing and developing resilience as crucial in our societal response to the climate crisis- but also emphasise that addressing the biodiversity crisis will improve our resilience, and this needs full recognition and appropriate levels of action - again through joint consideration between the Environment Strategy and the Green Growth strategy and outworkings of the UK Nature Positive report.