

**Energy Saving Trust's response to the
Northern Ireland Assembly Climate Change Bill consultation**



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1. What are your views on the overall policy objectives? Tell us what elements of the Bill you think will be effective or won't be effective.

“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 the Northern Ireland Climate Commissioner and Northern Ireland Climate Office; guarantee existing environmental and climate protections; and for connected purposes”

We believe that if properly enacted there is much in the Bill that would be effective. It is our view that the setting of legally binding final and interim targets is an effective means of galvanising support and signalling the direction of travel to society. As part of this governance regime the setting of periodic carbon budgets which draw on the strongest possible evidence base and are stretching but achievable can be an effective means of driving change. This approach is strengthened by taking a sectoral approach which takes account of the specific challenges particular sectors of the economy and society face in decarbonising. It is also our view that, if delivered well, a truly impartial and expert climate commissioner or similar could provide a vital oversight capability, holding the Executive and Assembly to account, providing advice and guidance and undertaking necessary information gathering and enquiry functions while engaging in long-term thinking and being ‘the face of the transition’ in Northern Ireland.

There are elements of the Bill which need refinement or may not be so effective. Most importantly it is our view, shared by the Climate Change Committee (CCC), that it is too ambitious for Northern Ireland realistically to reach net zero by 2045. We discuss this in greater detail in our response to questions 4 to 7. It is also our view that the precise role and responsibilities of the proposed climate commissioner need to be clarified and likely expanded. We discuss these issues in greater detail in our responses to questions 10, 11 and 17. In brief we think that the commissioner’s role needs to be more distinct from the role of the CCC and that for the commissioner and climate office to be effective they should be able to call inquiries and witnesses and commission research and reports.

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

It is our view that the Bill could meet several of the objectives laid out within it. We are strongly in favour of the setting of legally-binding climate targets and carbon budgets informed by the best available evidence which necessitate governments and legislatures to provide detailed plans of action which they are accountable to. We argued for this in our response to the DAERA consultation on the creation of a Climate Change Bill in February of 2021 (<https://energysavingtrust.org.uk/report/response-to-discussion-paper-on-northern-ireland-climate-change-bill/>). On these counts we think that the Bill would be likely to meet its objectives.

Where we have concerns about the ability of Northern Ireland to meet the objectives of the Bill are around the proposed 2045 target. This is ambitious but it is our view, and the view of the UK Climate Change Committee (CCC), that Northern Ireland will not feasibly be able to reduce its emissions to net zero by 2045 due to the scale of the challenge and the large share of Northern Ireland emissions originating from hard to decarbonise sectors such as agriculture and land use. The CCC have recently written to the Minister stating that it is their opinion, based on the best available evidence, that a reasonable and equitable share of the UK-wide net zero emission target translates to an 82% reduction in carbon emissions for Northern Ireland. We share this view.

3. Tell us your views on declaring a Climate Emergency in Northern Ireland?

We support this proposal. Northern Ireland is the only UK nation not to have declared a climate emergency. More pertinently we are quite clearly in the midst of a climate emergency and declaring one can be a galvanising step to encourage greater action. Clearly, however, it is not enough to simply declare a climate emergency, this must be accompanied by a deliverable plan to address the crisis we are facing.

4. 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?

The climate and nature emergencies are urgent, and swift action is needed to progress towards a decarbonised and sustainable future. We recognise the desire to set ambitious targets and we support the delivery of decarbonisation at pace. It is our view that as far as possible climate and environmental targets and budgets should be evidence-based, we are concerned that achieving the targets proposed in this Bill by 2045 would prove extremely challenging given the unique nature of Northern Ireland emissions, as highlighted by the Climate Change Committee (CCC).

The CCC have recently written to the Minister stating that it is their opinion, based on the best available evidence, that a reasonable and equitable share of the UK-wide net zero emission target translates to an 82% reduction in carbon emissions for Northern Ireland. We share this view. (<https://www.theccc.org.uk/publication/letter-lord-deben-climate-change-committee-to-edwin-poots-mla/>).

5. Do you think that the net zero emissions target is achievable?

Yes/No

6. Do you think that the timescale to deliver the net zero emissions target is achievable?

Yes/No

7. Do you think that the timescale outlined in the Bill to achieve net zero should be revised if circumstances change?

Yes, we agree it is important that flexibility is built into the Bill to account for any emerging evidence or change in circumstances. We think that a 2050 net zero target date should be set with flexibility within the legislation to amend this date if circumstances change. However, it is also important that Members of the Legislative Assembly (MLA) are accountable and that the reasoning for altering targets or budgets is sound. We are happy to discuss the details of each governance regime with Members if this would be useful. Alternatively, our response to the DAERA discussion paper on climate legislation discusses these governance regimes in greater detail (see: <https://energysavingtrust.org.uk/wp-content/uploads/2021/03/NI-Climate-Change-Bill-Energy-Saving-Trust-response.pdf>)

It is our view that a change in circumstance should be supported by one, or ideally all, of the relevant bodies described in Part 1 section 1 and the revised date should have to be agreed by a majority in the Assembly. As we have laid out in our response to the questions related to the proposed net zero target it is our view that this will not be feasible by 2045. We think that it would be best to introduce a Climate Change Bill with a net zero target that aligns with the recommendations of the CCC (ie an 82% reduction by 2050) with the ability to strengthen this if circumstances change.

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

We support the proposal to require the government to produce Climate Action Plans. This will allow the Northern Ireland Government to plan for and tackle the climate emergency on the ground, taking account of its own economies, communities, natural resources and challenges. Creating Climate Action Plans for Northern Ireland will send a clear, long-term signal to businesses and wider society on the direction of travel. All plans must be based on expert, impartial, scientific advice relating to the global as well as local context. We agree that the targets must take account of greenhouse gas emissions, water and soil quality as well as biodiversity within Northern Ireland, while at the same time taking account of transboundary issues. We also agree with the sectoral approach to policies and proposals but would stress the importance of a collaborative, inter-departmental approach and note that this will be necessary as many of the proposed sectoral categories will require input from more than one Executive department.

When considering how best to deliver Climate Action Plans, both the Scottish and Welsh Governments offer valuable precedents in their carbon budgeting and interim targeting

regimes. Both contexts may serve as useful to compare similarities or differences with Northern Ireland. The Welsh and Scottish climate governance structures call for 5-yearly carbon budgets which can enable medium- to long-term planning for both the public and private sector and be implemented in a way that encourages early and deep action to reduce emissions.

Welsh and Scottish Governments introduce carbon budgets between target years. This gives them a guide to the 'safe' level of emissions they can produce whilst sticking to their climate targets. Crucially, reporting and budget-setting years tend to span multiple parliamentary periods to ensure continuity across government terms and maintain impartiality. The Northern Ireland Government may seek to follow a similar approach to ensure Climate Action Plans are delivered effectively and spur early and sustained action. If a carbon budget is not met "no later than three months after laying the statement, the Welsh Ministers must lay before the National Assembly for Wales [now the 'Senedd' or 'Welsh Parliament'] a report setting out proposals and policies to compensate for the excess emissions in later budgetary periods." A similar approach is taken in Scotland for any missed annual targets.

We welcome the target-setting within Climate Action Plans taking a holistic approach, considering environmental, public health, well-being, fiscal, economic and social impacts. Scottish climate legislation lays out the economic impact changes may have on particular sectors, as well as social impacts or impacts felt by those living in particular regions, this could be a useful approach for Northern Ireland to consider. While the Welsh legislation is less prescriptive, it does make clear that the setting of targets or budgets, or any changes to these, must have regard to the Future Trends report from the Well-Being of Future Generations Act (WBFGA). This Act seeks to achieve the same goal as the Scottish criteria by taking account of wider socio-economic, cultural and environmental considerations.

We note that in Welsh climate target legislation the criteria for setting or amending targets include any significant changes in climate science, technology, or law. This includes if the changes in question have been recommended by the relevant advisory body (e.g. the CCC). When drafting climate action plans, it is our view that it will be essential to adhere to the latest climate science and take account of what is feasible in Northern Ireland while having regard for socioeconomic impacts and the effect on future generations, with the advisory body analysing and advising on the most appropriate targets. Embedding some time-based flexibility in Climate Action Plan targets and budgets may be necessary to reflect current scientific advice and future amendments or developments to that advice.

9. Do you think the proposed Climate Action Plans are an effective way of delivering the net zero target?

Yes/No

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

We agree with the proposed establishment of a Climate Commissioner and highlight the importance of ensuring that this role is properly resourced. We also support the role taking an impartial and non-political position. It is imperative that the Climate Commissioner is led first and foremost by scientific advice. In England, Scotland and Wales, the Climate Change Committee (CCC) fulfils a similar role by producing regular progress reports on targets and budgets. To an extent the CCC also provides this service to Northern Ireland though not currently in an official capacity (<https://www.theccc.org.uk/wp-content/uploads/2020/12/Lord-Deben-CCC-Letter-to-DAERA-Minister.pdf>). It is our view that Northern Ireland should seek to implement a similar official advisory role for the CCC through the Climate Change Bill with the Climate Commissioner taking on an additional role of engaging with the government, public and other stakeholders, communicating the route to net zero and holding government to account. Additionally, we recommend that this role should be outward looking, engaging with the Governments in the UK and Republic of Ireland as well as governments and bodies at the international scale to draw on best practice. We advise that the Climate Commissioner creates and retains strong links with the CCC to channel evidence-based advice through a place-based lens.

We also understand the value this new role can bring to represent and communicate the unique positioning of Northern Ireland in both local and global contexts. There is an existing tradition and value for Commissioners in Northern Ireland for example, Commissioner for Older People, Commissioner for Children and Young People and Commissioner for Victims and Survivors. Like these roles, a Commissioner for climate issues could become a public face for a green and just transition in Northern Ireland. The Scottish and Welsh Governments have set up similar frameworks for place-based engagement which focus on long-term and collaborative thinking to promote the needs of people in the transition. The proposed establishment of a Climate Commissioner presents an opportunity to consider the needs of both people and planet within the context of Northern Ireland.

Formal accountability must be embedded within the proposed Climate Commissioner role to ensure Northern Ireland pushes forward to play its part to address climate change. Much could be learned from the existing carbon budgeting and interim targeting regimes set out by the Scottish and Welsh Governments, particularly in relation to accountability. In Scotland, targets and budgets are legally binding and provide a reputational incentive. While in Wales carbon budgets require regular reporting on progress alongside proposals and policies to compensate for excess emissions in later budgetary periods.

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

We support the proposal for the Climate Commissioner to be responsible for producing regular progress reports to the Assembly. We suggest that the Commissioner should also oversee the production of one-off sectoral reports and any other ad hoc duties as required to help Northern Ireland address the climate emergency. To do so, we think that it's vital that the Climate Commissioner is an impartial, non-political voice informed by scientific evidence, with the power to hold committee sessions calling for evidence from Ministers in the Northern Ireland Executive as well as other key stakeholders and experts as they see fit.

It is worth noting that the Climate Change Committee (CCC) fulfils a similar role to the proposed Commissioner for both the Scottish and Welsh Governments through the production of regular progress reports, although not on an annual basis. It is our view that for the Commissioner to be an effective addition to the Northern Ireland climate governance regime they fulfil a distinct role to the one currently performed by the CCC for the Scottish, Welsh and UK Governments as we expect the CCC to continue to cover Northern Ireland as part of its UK remit and propose that Northern Ireland looks to give the CCC an official analysis and advisory role as is the case for the UK as a whole. Due to the unique geographical, environmental, political and cultural context here in Northern Ireland, the Climate Commissioner role should also serve to represent and take account of the unique challenges and opportunities facing Northern Ireland in its transition to a more sustainable society. The role could benefit from becoming a conduit for engagement between people and governance, perhaps feeding into the creation of a citizen's assembly on climate (something we discuss in greater detail in our response to Question 1 of the 'Additional Information' section).

Within that remit, the Climate Commissioner may also facilitate a platform for engagement with the public, as well as answering questions from the Executive, acting as the public face in Northern Ireland for an achievable and just transition to a fairer, greener society. A similar role is provided by the Scottish Government's Just Transition Commission which was formed in early 2019 to provide practical, affordable and actionable recommendations to Scottish Ministers. This Commission's role is largely fulfilled through on-the-ground engagement with Scottish businesses and communities. Its most recent report, published in March 2021, emphasises the importance of creating and communicating the benefits and opportunities of a just transition to people across Scotland (<https://www.gov.scot/publications/transition-commission-national-mission-fairer-greener-scotland>). This Commission illustrates the value of empowering people to lead the transition to a greener society and the proposed Climate Commissioner for Northern Ireland may benefit from embodying a similarly outward focus.

Wales' Well-being of Future Generations Act (2015) (WBFGA) also provides a useful model for Northern Ireland to draw lessons from in the creation of the Climate Commissioner and Climate Office (<https://www.futuregenerations.wales/about-us/future-generations-act/>). Central to the Act is the assurance that decision making addresses climate change alongside the well-being of future generations. The Act enables long-term thinking on behalf of people and communities to prevent persistent problems such as poverty and health inequalities as society shifts to meet climate targets.

By adhering to the seven overarching Well-being Goals and following the five Ways of Working stipulated by the WBFGA, policymakers in Wales are better able to craft policy and invest in a future that will spread the benefits of the transition more equitably. The proposed Climate Commissioner and Climate Office for Northern Ireland may benefit from working under similar aims and objectives, perhaps tasked with instilling them across government departments.

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

Yes/No

13. What impact do you think that these sectoral plans will have in terms of helping to achieve the net zero target?

It is our view that if these sectoral plans were developed rigorously with actionable plans designed to deliver tangible emission reductions then they would be beneficial in terms of helping to achieve a Net Zero target. As noted in our response to Question 1 of the 'Climate Action Plan' section, we suggest that the sectoral plans follow impartial, scientific advice and allow for some time-based flexibility in meeting targets if circumstances change in the future. Building-in some flexibility must be balanced with the need for formal accountability and due process in delivering targets set out in the sectoral plans.

It is welcome to see the full range of carbon emitting sectors represented in the proposed sectoral plans. It should be a priority for each sector to do as much as possible to reduce its emissions. It is right to develop sectoral plans which reflect Northern Ireland's society as a whole and that each Government department will have their own targets to meet. A critique of previous climate policy in the UK is that it has focused too rigidly on reducing emissions from the power sector which, while effective, has been the low-hanging fruit. The challenge now will be to address more difficult to decarbonise sectors. This sectoral action plan approach could help to address this.

In terms of the breakdown of the proposed sectors we feel that there would be value in drawing a distinction between residential and public buildings.

Delivering on these sectoral plans will require a strong degree of collaborative working as the proposed breakdown of sectors will necessitate drawing on expertise held within different Executive departments. What is welcome is that the sectoral plans are not only focussed on carbon reductions and environmental protection but also report on wider societal issues such as support for green growth and jobs, net-zero carbon investment and infrastructure, high-value work, reduction of inequality and elimination of poverty and social deprivation. Shifting to a resilient, sustainable society is vital to address climate change, but this shift must also have a positive impact on society. Fostering a joined-up approach between departments as well as across society will have added benefits in creating a synergetic circular economy where localisation of inputs and flows between sectors could help in the creation of green jobs and a greener economy.

Successful delivery of such plans will require a concerted effort, sufficient funding and dedicated capacity within departments. This will need a sustained joined up approach from Northern Ireland's government departments. This could be facilitated through the Cross Departmental Working Group on Climate Change (<https://www.daera-ni.gov.uk/publications/cross-departmental-working-group-climate-change-annual-report-2016>) which we believe has been re-established and could potentially be chaired by the Commissioner.

14. How do you think the below sectors might be affected by the proposals?

No answer.

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

The Department of Agriculture, Environment and Rural Affairs, The Northern Ireland Executive, Specific sectors of the Northern Ireland economy.

No answer.

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

No answer.

17. 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. Do you think that this is appropriate?

Yes/No

18. Are there other sources of expertise that may be needed to inform progress to achieve the net zero target?

Northern Ireland should look to draw on expertise wherever it is available. This means engaging with global experts such as the Intergovernmental Panel on Climate Change as well as local and regional experts. This means adopting best practice and lessons from

the Republic of Ireland Climate Advisory Council alongside the UK Climate Change Committee as well as more local experts such as those involved in ClimateNI, SustainableNI and NI EnvironmentLink. Academic experts from a range of fields should be consulted as should third sector and industry stakeholders. No one organisation has a monopoly on good ideas and advice and guidance should be sought from a wide cohort of stakeholders.

19. What are your views on the roles and responsibilities placed on public bodies as set out in the Bill? (e.g. DEARA having to run a scheme tracking carbon usage)

It is challenging at this stage to determine exactly what the specific roles and responsibilities will be for the named public bodies and public bodies in general. We do think that whichever Departments are tasked with delivering aspects of the Bill they will need sufficient funding and support. As we have discussed earlier in our response, the Climate Action Plans and Sectoral Plans, while a welcome approach, will require a significant amount of work and cross-departmental collaboration. For the overall success of the Bill and Net Zero this approach needs to be fostered now and strengthened as much as possible. Clear and standardised metrics and reporting policies must be developed to allow departmental bodies to compare easily against one another and an overall review to be easily undertaken by the Commissioner.

20. Do you think that there should be a lead responsible government department for delivering the aims of the Bill?

Yes/No

21. If you think there should be a lead department, please tell us which one and why:

We have not selected an existing government department because it is our view that the existing remits of the departments will need to be adapted to enable effective oversight and delivery of the Bill. We think that a new department should be created, or an existing

department altered, to create a Climate Change Department, or similar, which would have overall control of climate policy, along the lines of the new Climate Change Ministry in Wales (see: <https://gov.wales/julie-james-ms#section-71319>). Currently, responsibilities for addressing climate change are spread across departments making progress challenging. Climate change will impact upon every Department's remit and so it is essential that cross-departmental collaboration is achieved. Addressing the nature and climate emergencies must be a consideration in every decision the Executive makes.

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

No answer.

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

“transboundary element” means any negative impact on the environment of Northern Ireland, including its waters and atmosphere, from activity which occurs in any of the following areas— (a) the Republic of Ireland; (b) Scotland; (c) Wales; and (d) England.

We welcome the inclusion of transboundary issues as part of this Bill. It is important that those responsible for emissions or pollutants are held accountable for addressing them.

While we recognise the desire to account for negative impacts on Northern Ireland's atmosphere and environment from its neighbours, equally the pollution and emissions caused by consumption in Northern Ireland in other parts of the world should be accounted for.

While this consultation is at an early stage of the deliberation process, we feel that Northern Ireland should seek to include consumer emissions in any future climate targets, budgets and estimates. Currently, emissions resulting from the consumption of products produced overseas are not accounted for in UK climate targets and emission estimates, though there is a suggestion that this may change in the future (see: www.telegraph.co.uk/environment/2021/01/13/carbon-footprint-imported-goods-could-included-emissions-target/). Both Wales and Scotland make provision in their Climate

Acts to account for emissions produced by Welsh or Scottish consumption of foreign goods. This could be of particular importance for Northern Ireland given the large amount of cross-border trade with the Republic of Ireland. As described above, taking this approach could also work in Northern Ireland's favour when accounting for Northern Ireland emissions generated as a result of producing goods for the rest of the UK and Ireland. For example, a high share of Northern Ireland's agricultural emissions relate to the production of food products exported and consumed elsewhere in the UK and Ireland.

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

Yes/No

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

Yes/No

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

No answer.

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

Seeking immediate advice

It is our view that if a net zero by 2045 target is set the Assembly should in the first instance consult with the CCC regarding the feasibility and deliverability of such targets and seek

advice for how they could possibly be achieved with as little disruption as possible. Until December 2020 the Climate Change Committee had considered that neither Wales nor Northern Ireland would be able to reach net zero by 2050. Five years ago Wales was considered to be in the position Northern Ireland is now (in terms of reasonable levels of emission reductions) with the CCC recommending an 80% reduction by 2050. However, recent analysis has identified a narrow pathway through which Wales can reach net zero by 2050 even though the same challenges remain. Largely this has been possible thanks to better than expected reductions in power sector emissions and the falling price of renewables as well as a reliance on behaviour change or innovative technology to make up the final 5% or so of emission reductions. Predictions can change relatively quickly if circumstances permit but a national conversation should be started immediately if the Assembly plans to persist with a net zero by 2045 target. We would like to reiterate that our view is that Northern Ireland should follow the best advice available and adopt a feasible target for 2050 with the possibility to increase ambition if circumstances change.

Legally binding interim targets

We think that it is important that decarbonisation happens at pace. The CCC argued strongly in favour of this front-loading approach in their Sixth Carbon Budget because of the cumulative nature of long-lived greenhouse gases. It is our view that a strong climate governance regime should have legally binding interim as well as final targets to spur early action. This could form an essential part of each Climate Action Plan. In designing such a regime we think that the Welsh carbon budget structure is a model that could be readily adapted for the Northern Ireland context. It draws on the most up-to-date advice and scientific evidence, is set long in advance of the commencement of the budget period and has accountability as a central part of the process. In Wales these carbon budgets give guidance on 'safe' levels of emissions for a given five year period while the headline interim targets in 2030, 2040 and 2050 indicate the long-term trajectory allowing the public and private sector to better plan ahead. If they are designed well they can encourage the front-loading of climate action in earlier periods.

Carbon budgets are also able to give clear, long-term signals to businesses and society on the direction of travel, allowing for investment and tailored support, making achieving a 'just transition' more likely. Engaging early and effectively with a range of stakeholders and the people of Northern Ireland more generally, will also help to facilitate a just transition.

Targeting a just transition through citizen assemblies

On a just transition, we strongly welcome the proposed requirement for targets to be set taking account of “the impact of such targets on public health and well-being; the impact of such targets on fiscal, economic and social circumstances specific to Northern Ireland;”. We have discussed elsewhere in our response that the experience in Wales of creating the Well-being of Future Generations Act and accompanying Well-being of Future Generations Commissioner could offer useful lessons for Northern Ireland to employ when thinking about wellbeing criteria.

Another effective means of securing a just transition and citizen engagement is through citizen assemblies. The UK Citizen’s Assembly has been viewed as a great success and illustrates that an informed and engaged public are broadly supportive of ambitious efforts to address the climate crisis even if government have been slow to implement their recommendations (see: <https://committees.parliament.uk/publications/6617/documents/71408/default/>).

There is also precedent for including provision for such citizen climate assemblies in climate legislation. The Scottish Climate Change Act calls for Scottish Ministers to establish a panel to be known as a “citizens assembly” made up of such persons as the Scottish Ministers consider to be representative of the general populace of Scotland. The citizen’s assembly will then operate in a similar manner to the UK assembly, considering the latest in climate science and the full suite of possible solutions before ultimately reporting back to Scottish Ministers with a series of recommendations. The Scottish Ministers must, within 6 months of receiving a copy of the report, publish a statement setting out how they intend to respond to the recommendations made in it. This process is ongoing (see: <https://www.climateexchange.org.uk/blog/scotlands-climate-assembly-learning-about-climate-change-causes-and-impacts/>). The Institute for Public Policy Research have also recently published a report into the findings of several citizen assemblies held across Great Britain over the past 18 months, finding once again that the public are eager to see governments do more and spend more, on addressing climate change as part of a just transition (see: https://www.ippr.org/fairness-and-opportunity/?mc_cid=6e2db74b70&mc_eid=310567389b).

A similar approach in Northern Ireland would be beneficial, giving policymakers and other stakeholders an opportunity to engage meaningfully with a representative sample of the populace, allowing policy in Northern Ireland to be guided by the priorities identified by the citizen assembly. An assembly could be convened, engaged with and produce its recommendations before the Executive elections next May, allowing parties in Northern Ireland to offer an ambitious set of proposals to the electorate.

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

No answer.