

**NI Assembly Agriculture, Environment
and Rural Affairs Committee:**
Call for views on the draft Green Growth strategy
Energy Saving Trust response

Main landing page [Consultation on the draft Green Growth Strategy for Northern Ireland Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](#)

The Bill: [Green Growth Brochure V8.pdf \(daera-ni.gov.uk\)](#)

Draft Green Growth Strategy – Consultation

Overview

We are facing a climate emergency and we know we need to act, and act quickly. This Green Growth Strategy sets out an ambitious vision and a framework for delivery with which all other NI government policies and strategies must align. It provides us with a vitally important opportunity to embed wider climate change, a green economy and environmental considerations into decision making. This will ensure that new policies and programmes align with the need to address climate change, develop green jobs and address biodiversity commitments.

Why your views matter

We want you to tell us what you think of our assessment of the situation, what needs to change, and the commitments and infrastructure needs and priorities going forward. We look forward to hearing from you and are keen to engage with you.

The survey should not take long to complete and seeks views on our vision, principles, proposed approach, delivery and monitoring. Some questions have comment boxes

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for you to provide your answers in, please note the boxes should expand as you continue to type.

If you are unable to complete the survey online, please contact the Green Growth coordination team by email at: GreenGrowthFeedback@daera-ni.gov.uk

An easy read version of the consultation document is available online but if you need documents to be provided in an alternative format, please let us know.

Responses to this consultation are invited until 11.59pm on 21st December 2021. Following consideration of all responses, a full analysis report will be published on DAERA's website.

If you would like to speak to a member of the team about the Green Growth Strategy or the approach being taken, or if you or a group you are involved with would like to participate in a consultation, please let us know.

Privacy

The information you provide in completing this consultation will be controlled and processed in line with Data Protection Legislation by DAERA. To find out more about how we handle your personal information, DAERA's Privacy Notice can be viewed online at <http://www.daera-ni.gov.uk/daera-privacy-statement>
<<http://www.daerani.gov.uk/daera-privacy-statement>>

About You

About You - Individual

If you are responding as an individual, please provide us with the following details:

1 Name Robert McCreery

Please enter

2 E-Mail address

Please enter Robert.mccreery@est.org.uk

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3 Are you responding as an Individual or on behalf of an Organisation?

Individual

On behalf of an Organisation

Please select only one item

(Required)

About your Organisation

If you are responding on behalf of an Organisation, please provide us with the details below:

4.a Which option best describes where you currently live?

Rural

Urban

Please select only one item

(Required)

Question 4 does not apply to someone responding on behalf of an organisation

Question 5 does not apply to someone responding as an individual

4.b Gender

Male

Female

Other

(Required)

Please select only one item

4.c Age

Under 25 years

25-64 years

Over 65 years

Please select only one item

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5.a Name of Organisation

Please provide the name of your Organisation **Energy Saving Trust**

5.b Headquarters address of your Organisation

Please provide the Address of your Organisation (if your Organisation is not Headquartered in NI, please provide your

Organisation's NI office/base address) 48-60 High St, Belfast, BT1 2BE

5.c Your position within the organisation

Please indicate your position within this Organisation **Policy Officer**

The Draft Green Growth Strategy includes the following Vision for 2050:

“Northern Ireland has taken significant action for the climate and our environment, has placed nature and biodiversity on a path to recovery, and moved from an high to a low emissions society. We have made this change fairly and have demonstrated a responsibility for each other and for the place in which we live. As a result of all our efforts, we have a more resilient environment with a healthy ecosystem and a strong sustainable economy. More people are employed in green jobs and all generations benefit from improved wellbeing”

Reimagining our future

6.a Is our Vision for 2050 the right vision?

Yes/No

Please select only one item

6.b If not, what would you change?

The climate emergency is urgent, and swift action is needed to progress towards a decarbonised future. Energy Saving Trust concurs with the Vision for 2050 outlined in this consultation as it recognises “Consequences of the environmental crisis fall disproportionately on those countries and communities that have contributed least to the problem and are least able to mitigate the harms.”

([https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(21\)01915-2/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)01915-2/fulltext))

Integration of decarbonising and environmental principles within policy making will be key to ensuring that Northern Ireland delivers on the commitments that have been outlined,

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NO Please select one (Required)

Reimagining our future

The draft Green Growth Strategy includes the following principles:

Respect our planet – by restoring and protecting our natural capital. Future human wellbeing depends on a healthy and resilient natural world

Decarbonise – replace fossil fuels with renewable energy

Reduce our wasteful use of resources – through greater efficiency and an increasingly diverse and circular economy

Re-evaluate, recognise and reward what matters – create genuine, shared wellbeing by prioritising human development that we and the planet can live with

Lead by example – inspire ambition, innovation and courage for change. Show the way by being honest, open and transparent in measuring our progress

Collaborate – work and learn together to develop solutions that maximise the outcomes we want to see

Use all tools available – balancing and utilising tools such as regulation, legislation, incentives, information and budgets

Share responsibility – we all must act and ensure that there is a just transition to a low carbon, nature rich society

Measure progress – openness and transparency about progress, regularly evolving our actions through continuous learning and improvement based on data and

science.

7.a Are our Green Growth principles right?

(Required) Yes No

1 – Respect our planet Yes

Please select only one item

2 – Decarbonise Yes

Please select only one item

3 – Reduce our wasteful use of

resources Yes

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Please select only one item

4 - Re-evaluate, recognise and reward

what matters **Yes**

Please select only one item

5 - Lead by example **Yes**

Please select only one item

6 - Collaborate **Yes**

Please select only one item **Yes**

7 - Use all tools available **Yes**

Please select only one item

8 - Share responsibility **Yes**

Please select only one item

9 - Measure progress **Yes**

Please select only one item

Are our Green Growth principles right? **Yes**

7.b If no, please explain

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

Yes/No

Overall, we welcome the principles outlined which clearly offer a balance between rapid decarbonisation, fairness for consumers, and economic sustainability while looking forward to the role of flexibility and integration to deliver a net zero Northern Ireland. Collaboration will be a key principle as there is a need for cross-departmental working and strengthened governance to ensure that efforts are not duplicated, action can be taken efficiently, and it is clear who leads on given policy areas.

8.b If no, please explain

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

Yes/No

Proposals for embedding a Green Growth test when considering the appraisal of all policies, programmes, and projects for which there are public funding implications are welcome. Placing this requirement on a statutory footing like requirements for consideration of equality and rural proofing will ensure consideration at an early stage. Making Green Growth a budgetary priority also is key in that as far as possible environmental targets and budgets should be evidence-based. We deem it essential that consumers are at the heart of the strategy. This consumer centric view is vital, as the strategy will only be successful if people support it.

No

(Required)

Please select only one item

9.b If no, please explain

10.a Should Green Growth be one of our top Executive investments and budgetary priorities?

Yes/No

Northern Ireland has challenges, with 68% of homes heated by oil boilers, higher levels of fuel poverty than elsewhere in the UK, high reliance on personal vehicles and under-developed electric vehicle (EV) infrastructure. It is our view that the transition must be just and that the significant economic (as well as social, wellbeing etc) benefits of this change should be equitably distributed. Budgetary priorities must therefore be targeted for Green Growth to achieve the principles outlined.

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(Required)

Please select only one item

10.b If no, please explain

Pathway to a low emissions society

In order to ensure we transition to a low carbon society in Northern Ireland, the draft Green Growth Strategy includes the following Executive commitment:

Commitment 2: We will introduce legislation for reducing greenhouse gas emissions consistent with the UK's ambition to achieve net zero by 2050 and, to deliver upon this, we will develop clear targets and pathways in a Climate Action Plan from 2022.

11.a Do we need specific targets for each sector set out in climate action

plans?

Yes/No

Please select one (Required)

Please select only one item

11.b If Yes, how would this be brought about?

It is our view that sectoral targets, if developed rigorously with actionable plans designed to deliver tangible emission reductions, would be beneficial in terms of helping to achieve a Net Zero target. 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 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. Within previous climate policy there has been a major focus on reducing emissions from the

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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.

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.

Delivering on 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 required is that 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.

11.c If no, how should we ensure we drive change?

12.a Do you agree on the definition of the sectors?

Yes/No

In terms of the breakdown of the proposed sectors there would be value in drawing a distinction between residential, non-residential, and public buildings. We believe sectors reported against are guided by the need for transparency as well as by the science and evidence used to inform target and trajectory setting. Since this science and evidence is provided by the Climate Change Committee then sectors should align to enable ongoing comparisons and tracking.

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No

Please select one (Required)

Please select only one item

12.b If no, please explain

Transition in the right way

To ensure that the lives and wellbeing of the citizens of Northern Ireland are protected and enhanced throughout the necessary transition, the draft Green Growth Strategy includes the following Executive commitments:

Commitment 3:

We will ensure that the transition we make will be a “Just Transition”, fair for all our citizens, and we will establish a Just Transition Commission in 2022.

Commitment 4:

We commit to putting citizens at the heart of our Green Growth policy development and delivery by ensuring ongoing engagement with young people and other

key groups, including a Citizen Assembly Panel.

Commitment 5:

We will promote behavioural change by providing low carbon options, infrastructure, timely information, advice and support to citizens and businesses to enable them to make informed choices on the transition to a low emissions economy.

Commitment 6:

We will ensure our decisions and actions associated with the transition to low emissions, green jobs and a clean environment are underpinned by robust and timely evidence and science.

13.a Do you agree with the adoption of a Just Transition approach?

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Yes/No

Above all, Energy Saving Trust believes there needs to be a legislative requirement for and subsequent economic commitment to a just transition in Northern Ireland.

Alongside investments in low-carbon infrastructure all governments should be seeking to ensure that the societal transition required to ultimately reach net zero is fair and just. The transition to net zero offers all nations the opportunity to create sustainable and prosperous economies that work better for all citizens and Northern Ireland is no exception.

On a just transition, we strongly encourage the 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;”. 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.

No

Please select one (Required)

Please select only one item

13.b If no, what approach should we be taking and why?

14.a How do we ensure this Just Transition – Is a Commission the right way forward?

Yes/ No

Northern Ireland Assembly should consider a body tasked with analysing how the Executive’s policies and proposals align with the need for a just transition and ensuring that the need for a just transition is accounted for in decision-making across departments. A Commission is one option and a good one. However, no clear details as

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to how such a Commission might work were provided in the consultation document which makes it difficult to comment in detail beyond expressing an opinion on the principle of having a Commission, which Energy Saving Trust would support.

In Scotland the Just Transition Commission (www.gov.scot/groups/just-transition-commission/) has been created “to advise Scottish Ministers on how to apply Just Transition principles to Scotland”. The Commission is tasked with producing a written report to Scottish Ministers with “practical, realistic, affordable recommendations for action”. The Commission has recently published a report into the key opportunities and challenges Scotland faces in achieving a just transition (see: <https://www.gov.scot/publications/transition-commission-national-mission-fairer-greener-scotland/pages/3/>).

Achieving a just transition requires the Executive and individual departments to 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 alongside emission reductions. We believe that a Commission can support these aims 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”.

No

Please select one (Required)

Please select only one item

14.b If no, please provide your suggestions

From Policy to Delivery

To enable delivery of the Green Growth vision, the Green Growth Strategy includes the following Executive commitments:

Commitment 7:

We will transform our economy by working proactively with businesses, communities and all parts of government to maximise funding and investment opportunities for Green Growth and promote innovation, skills, research and technology.

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Commitment 8:

We will provide public sector leadership by delivering a government estate and fleet with net-zero operational carbon emissions and ensure a Green Growth aligned procurement strategy for all government spend.

Commitment 9:

We will commit to ensure all government departments and the wider public sector work together to maximise our decarbonisation efforts, and will work in partnership with our neighbours across UK regions and the Republic of Ireland.

15.a 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?

Yes /No

Citizen assemblies are an effective means of securing a just transition and citizen engagement. The UK Parliament’s 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 ([Scotland's Climate Assembly - learning about climate change causes and impacts \(climatexchange.org.uk\)](#)) The Institute for Public Policy Research have also 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

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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.

A Citizens Assembly would be a good initial step, but engagement should not be simply limited to a Citizens Assembly if one is set up, as broader engagement will still be a requirement.

No

Please select one (Required)

Please select only one item

15.b If no, please provide your suggestions

From Policy to Delivery

To enable delivery of the Green Growth vision, the Green Growth Strategy includes the following Executive commitments:

Commitment 7: We will transform our economy by working proactively with businesses, communities and all parts of government to maximise funding and investment opportunities for Green Growth and promote innovation, skills, research and technology.

Commitment 8: We will provide public sector leadership by delivering a government estate and fleet with net-zero operational carbon emissions and ensure a Green Growth aligned procurement strategy for all government spend.

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Commitment 9: We will commit to ensure all government departments and the wider public sector work together to maximise our decarbonisation efforts and will work in partnership with our neighbours across UK regions and the Republic of Ireland.

16 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?

In essence the Executive needs to set a clear policy and legislative framework with clear SMART targets and milestones so that all sectors know and understand as far as possible, what the targets are and what needs to be done.

Appropriate funding and support mechanisms we believe need to be put in place to promote the key technologies which require development to ensure delivery of decarbonisation efforts.

Existing ties with businesses through Invest NI need to be strengthened and information shared across other departments, so that correct advice and support is given to business and SME's during the transition. The consultation states that "innovation, technology, skills, partnership, collaboration, and leadership" are key in delivering the "Green Growth vision". It also outlines ambitions to consult fully with stakeholders at every stage. Clearly representation from sectors such as Construction Employers Federation, Manufacturing NI, SMEs, social enterprises, are important however voices from all other representative bodies and sectors need to be fully included in stakeholder engagement at each stage of the process.

Examples of innovation given, demonstrate that many communities and businesses in Northern Ireland are already playing their part. Policy and legislative direction must now be provided by the Executive to essentially direct Northern Ireland further in the required direction.

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

Purchasing power of government and all statutory bodies in Northern Ireland is significant with expenditure of £3bn annually, representing a quarter of Northern Ireland Executive's budget. <https://www.northernireland.gov.uk/node/48239>

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The public sector should lead by example most notably through procurement and by setting the appropriately supportive legislation and policy. Energy Saving Trust would support the recommendation on page 58 to adopt a Green Growth aligned procurement strategy for all government spend. This is another area where interdepartmental collaboration will be key to achieving the goals in the Green Growth strategy including lowering emissions and cost saving.

Good examples of saving can be found in the cross Departmental energy procurement contracts already initiated within the “Northern Ireland Central Government Energy Management Strategy and action Plan” Many supply chain benefits arise from these exercises including flexibility, responsiveness, resilience and opportunities for reducing carbon emissions and waste production.

NI could learn from Scotland’s sustainable procurement duty, outlined in the Procurement Reform (Scotland) Act 2014 <https://www.gov.scot/policies/public-sector-procurement/sustainable-procurement-duty/> which aligns with the Scottish government’s purpose to create a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.

A key area where local government can lead by example is the adoption of climate change and Net Zero strategies by all Departments and their Arm’s length bodies to demonstrate a clear intent to invest in this area. While we understand that the public sector accounts for a small proportion of overall energy emissions, they play significant roles in communities across Northern Ireland. Schools, hospitals, and local authority buildings can be pioneers in the transition. For example, they could be encouraged to host renewable assets wholly or partly owned by local people or community groups, with a contract in place to supply the host site with the generated electricity at a fixed rate through a power purchase agreement. This has the potential to benefit each of the stakeholders involved, with the public estate contributing to decarbonisation and paying a fixed rate for their electricity, often below the market rate, and the community in question receiving a fixed amount to produce the electricity, which can then be reinvested to create additional value. This is a model which has already been successfully deployed in other parts of the UK.

Linkages between the public sector and the voluntary sector are important and should not be overlooked. Eco Schools run by Tidy Northern Ireland has a very high participation rate within schools across the province, encouraging good environmental management in this sector. “The primary aim of the Eco-Schools programme is to

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educate and empower young people to make positive decisions and become change makers for an environmentally sustainable world “. This programme focuses on achievement at a range of award levels ie Bronze, Silver and Green flag, with external assessors provided from volunteers with environmental expertise across a range of both public and voluntary sectors. It is essential that these young people who will live in the future low carbon economy have opportunities to comment and influence direction. (<https://www.eco-schoolsni.org/cgi-bin/generic?instanceID=1>) [Introduction to Eco-Schools \(eco-schoolsni.org\)](https://www.eco-schoolsni.org)

Measuring & Monitoring our success

Citizens must be able to see the benefits from making low carbon choices and enhancing the environment. The Green Growth Strategy includes the following Executive commitment to help us measure progress:

Commitment 10:

We will ensure sound governance and reporting arrangements for the delivery of the Green Growth Strategy and Climate Action Plan by recommending that the Assembly establish a Standing Committee on Climate Action and agree a monitoring framework for measuring progress.

Next Steps

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

Energy Saving Trust would recommend that for the sake of consistency the indicators used in the Green Growth strategy should, as appropriate, closely reflect those indicators that are to be used in the draft Programme for Government (PfG).

Useful indicators could possibly include:

GHG emissions (the basket of GHGs) for each sector

Biodiversity in terms of area of intact habitat e.g. of peatland and species abundance e.g. for the freshwater pearl mussel and the extent and percentage of features of ASSIs and N2K sites in favourable condition.

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Distance from/access to and use of green space including levels of active travel
 Number of and severity of water pollution incidents
 Quality of water bodies (as per WFD standards)
 Air quality and related hospital admissions, illnesses, and deaths due to air pollution
 Physical and mental health and wellbeing related indicators including new measures such as a measure of wellbeing as well as existing indicators including levels of fuel poverty; number of jobs created in the Low Carbon and Renewable Energy (LCRE) sector, as well as detail on job security and contract length, pay rates, employment rates and other measures of equality and inequality.

Independent monitoring of results is clearly a priority and proposals that the Climate Change Committee (CCC) will be involved are to be welcomed. The consultation states “Subject to the final form of Northern Ireland Climate Change legislation adopted, it is envisaged that the CCC would be further utilised to undertake Northern Ireland level reporting in terms of emissions reductions achievement against an Act’s targets, advice on NI specific carbon budgets, adaptation planning advice, and mid-term and end of programme reviews”. This input is clearly necessary to provide consistency of reporting across all regions of the United Kingdom.

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

The consultation suggests that a Climate Action Assembly Standing Committee be established to ensure effective oversight of the Green Growth strategy. This may be beneficial but again there is a lack of detail in the consultation as to how this might operate. Without this clarity Energy Saving Trust does not believe that the case has been adequately made for Green Growth not to be within the remit of the relevant Assembly committee, the Committee for the Executive Office.

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

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Energy saving Trust welcomes the publication of the Green Growth strategy, the level of co-operation between departments that was necessary to produce this draft strategy and the recognition by the Northern Ireland Executive of the need for change. It is important to recognise that there is a very high level of public support for change. For example, a 2020 survey commissioned jointly by the RSA's Food, Farming and Countryside Commission and the Food Foundation found that 91% of the public said they don't want things to go back to how they were

<https://community.rspb.org.uk/getinvolved/b/steppingupnorthernireland/posts/new-poll-shows-strong-public-support-for-a-green-recovery>¹. A Department for Business, Energy and Industrial Strategy (BIES) Public Attitudes Tracker Survey, in June 2020 found that 80% expressed support for renewable energy, with only 2% opposing it. Department for Business, Energy and Industrial Strategy BIES Public Attitudes Tracker (June 2020 Wave 34 UK)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906452/BEIS_PAT_W34 - Key findings.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906452/BEIS_PAT_W34_-_Key_findings.pdf)

For the benefit of the people of Northern Ireland, the Executive needs to shift its focus towards improving protection for nature and development of a low carbon economy, and must provide the investment needed in laws, policies, research, monitoring, finance and investment and other support mechanisms that will ensure that change happens.

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