Northern Ireland Climate Change Bill

CONFOR RESPONSE TO DAERA DISCUSSION DOCUMENT

Confor (www.confor.org.uk) is the not-for-profit organisation for the UK's sustainable forestry and wood-using businesses. It has 1,500 member companies, representing the whole forestry and wood supply chain.

In February 2020 the Northern Ireland Assembly declared a 'Climate Change Emergency'. However, currently there is no specific Northern Ireland climate change legislation, unlike the rest of the UK. DAERA are consulting on bringing forward this legislation, and Confor are grateful for the opportunity to respond.

1. Which of the following high level options do you think is appropriate for Northern Ireland to take forward?

Option 2. It is right that the long-term target should consider expert scientific advice. However, decarbonisation potential through technology, science and nature, is improving rapidly. Therefore, the legislation should include an obligation to increase the target to net-zero emissions by 2050 should expert advice consider this feasible.

For example, the speed of carbon sequestration by forestry trees is increasing rapidly with improved genetics, silviculture and the potential availability of better land, and forecasts to be published by National Forest Inventory in 2021 are likely to suggest the speed of sequestration by wood-producing forests can be increased substantially. In addition, understanding of the full carbon benefit of Harvested Wood Products (HWP) through the supply chain, and of managing woodland for carbon, is a complex and rapidly developing area.

2. Do you have any opinions on what would be the most important criteria to be considered when setting or updating long term and interim emission reduction targets?

The targets should take into account the three challenges of decarbonisation, sustainable resource provision, and biodiversity decline. The impacts of given policies should be considered through whole-systems approaches across economic sectors.

For example, in designing forestry policy, it is not adequate simply to consider the carbon sequestered on site, or the relative biodiversity and carbon benefit of mixed wood-producing forests versus native amenity woodlands. It is also important to consider the biodiversity and carbon impact of using alternative materials to timber (eg. plastic, concrete, steel), both at the points of production and disposal; and the biodiversity and carbon impact of an undersupply of timber driving 'overcutting' at a global scale. This means forestry policy is not just a key consideration for Land Use Change, but also for economic growth and circular economy, industry, waste, and global trade. These departments should collaborate to build on the welcome start made by 'Forests for our future' to plant the wood needed to deliver decarbonisation across the economy.

3. Do you think flexibility should be built into the Bill, to allow consideration of new emerging evidence and science on climate change (such as for example on long lived and short lived pollutants) when setting emission reduction targets?

Yes, however, it should only be flexibility to make targets more ambitious. It should not provide an opportunity to reduce targets to avoid making difficult policy decisions.

4. Do you agree that a Northern Ireland Climate Change Bill should include a duty for 5 yearly carbon budgets to set a statutory cap (interim emission reduction targets) on total greenhouse gases that can be emitted in Northern Ireland?

Yes, in Scotland and Wales regular carbon budgets have proved essential for focusing policy action. Policy making in England has suffered as a result of not having separate budgets for England and working from UK-wide figures.

5. Should provision for reporting on adaptation measures by 'major player' public bodies be included in a Northern Ireland Climate Change Bill?

Yes. This will provide an opportunity to ensure public bodies have considered all the options available. For example: for the Forest Service to report on how they are ensuring climate resilience in forests; for all public bodies including Local Authorities to ensure they have considered tree planting as a solution to flooding etc. The reporting framework should be proportionate to the size of the organisation. The government should be willing to use public sector land to meet tree-planting targets, for example Northern Ireland Water Services land could be used to grow productive conifers providing natural capital benefits, a carbon sink, future income, and substituting high embodied energy products such as steel and concrete.

6. Should provision for reporting on mitigation measures by 'major player' public bodies be included in a Northern Ireland Climate Change Bill?

Yes, this will ensure that climate change mitigation is kept in mind across public bodies. The reporting framework should be tailored and proportionate to the different bodies, but should highlight opportunities. For example bodies which might undertake construction projects should have to report on measures to increase the use of wood; and bodies should report on progress on their commitment to plant trees under Forests for Our Future. A review of a wide range of wood products suggests that for every tonne of wood used, 1.2tC is saved from not using alternative materials, in addition to 0.9 tonnes of CO_2 equivalent stored in each cubic metre of wood itself.[1]

7. In addition to continuing to avail of the expertise of the UK Climate Change Committee, should we also include provision in the Bill, for an independent Northern Ireland advisory body on climate change?

No. The UK Climate Change Committee has been effective in providing advice to Scotland and Wales, demonstrating a strong ability to involve key stakeholders and understand the regional situation, while providing a valuable pan-UK overview.

[1] ERAMMP National Forest in Wales Evidence Review, Annex 4, p.33.

8. Do you have any other comments in respect of the issues raised in this discussion document?

The document demonstrates that agriculture and land use change is comparatively more important in NI than in the UK as a whole. Agriculture accounts for 27% of carbon emissions in NI but only 10% across the UK, while land use accounts for 3% of carbon emissions compared to -2 % across the UK. Agriculture is the biggest contributor to climate change overall. The document notes that 'Tree planting is one of the most reliable ways to directly sequester carbon from the atmosphere that is currently available'. It also notes that Harvested Wood Products deliver a significant addition (0.1 $MtCO_2e$) to the forest carbon sink (0.6 $MtCO_2e$).

Growing timber on former grazing land or marginal cropland has a huge carbon benefit, reducing methane-emitting livestock, reducing nitrates, and, on suitable soil, transforming the soil carbon balance from loss to gain. At the same time, it keeps the land productive, providing an income to the landowner, sustaining local jobs and GVA, and supplying an essential feedstock for developing a low-carbon bioeconomy including activities such as increased wood in construction, biorefining, and reduction in hard-to-recycle waste since at the end of life wood can be used to produce renewable energy, potentially combined with CCS technologies.

9. Are there any important issues you feel have not been adequately covered at this early discussion stage?

Tree planting targets have not been met. DAERA had set a target to increase the woodland cover to 12% by 2050, requiring c.1,200 hectares of new woodland creation per year, while the Climate Change Committee recommended 900. However, in the past 10 years there has never been more than 300 hectares. Unless action is taken across government to empower DAERA to act to deliver these targets, they will continue to be missed. Growing wood to supply the low-carbon economy is of fundamental importance for resilient decarbonisation across many departments of government, so the necessary support must be given to start hitting targets and creating the certified, sustainably-managed forests of the future.