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Submitted via email to: climatechangediscussion@daera-ni.gov.uk

15th January 2025

Dear Just Transition Commission Team

Re: Consultation on the establishment of a Just Transition Commission

Due to pressure of time and workload we are unable to complete a full response to the Department's consultation on the establishment of a Just Transition Commission. We wish to fully endorse the Women's Policy Group (WPG) response (of which we are a member).

Therefore, please accept this letter as our response calling on the Department to fully consider the detail of the WPG response and highlighting the following issues:

- The consultation runs for a 9-week period from 11 November 2024 to 13 January 2025 (subsequently extended to 20 January). Equality Commission guidance on consultation principles recommends that consultation periods last for a minimum of twelve weeks.¹ In addition the consultation period extends over the Christmas period when potential respondents will be on leave further shortening the consultation period.
- The Women's Regional Consortium welcomes the creation of a Just Transition Commission as set out in The Climate Change Act (Northern Ireland) 2022.
- We agree with our WPG colleagues that the Commission should be established as an Advisory Non-Departmental Public Body so that it can effectively hold the Executive Departments to account. We also agree with proposals to follow the Scottish model.

¹ <https://www.equalityni.org/Employers-Service-Providers/Public-Authorities/Section75/Section-75/PublicConsultation/Consultation-principles>

- We agree with our WPG colleagues that representatives from the transport, energy and finance sectors should be included in the Commission.
- As well as those listed in Section 37(4) of the Act the Women’s Regional Consortium would like to see specific inclusion of a women’s sector representative on the Commission. The International Labour Organization (ILO) has argued that “*gender equality must be at the core of promoting green economies that are low-carbon, resilient and sustainable.*”² As was the case for the appointment of Commissioners to the Just Transition Commission in the Republic of Ireland we would like to see appointments to the Commission having “regard to the desirability for gender balance, diversity and inclusion.”³
- We agree that the Commission should have a power to establish Ad-Hoc Committees or working groups to secure additional knowledge or expertise and support the recommendation of the WPG that the Commission should consider Ad-Hoc Lived Experience Committees specifically. The importance of lived experience cannot be understated.
- In terms of key initial priorities for the Commission we fully support the WPG’s recommendation to embed a gender lens from the very start of the Commission’s work.
- We refer the Department to the **ARK Policy Brief ‘Achieving a Just Transition in Northern Ireland’**⁴ and in particular the following points made in this Policy Brief where the Women’s Regional Consortium has shared views and concerns:
 - Policy on climate change and a Just Transition needs to be considered in the context of other social policies such as addressing poverty, rural proofing and economic growth. Some participants argued, for example, that failure to effectively address the extent of fuel poverty in NI and the reliance on oil for home heating jeopardised the potential for a Just Transition.
 - Evidence suggests that political will is fundamental to achieving progress and there was some concern about the extent of political commitment in NI.
 - Recent research of 1,000 NI residents demonstrated that while 80 per cent of these respondents supported renewable energy projects, 47 per cent did not want net zero policies to negatively impact their finances (Cavendish Consulting, 2024).
 - Attention was drawn to the importance of a ‘democratic transition’ – involving ordinary citizens in debate and policy making and there was strong consensus on this point.
 - The need to clearly communicate that the status quo is not just, and to involve citizens in conversations about how a more just and equal society could be achieved.
 - A thread running through the discussion at the roundtable was the importance of localism and the need for policies and strategies to be developed in partnership with communities.
 - Achieving the shift in energy production from fossil fuels to renewables on the scale needed was considered to be challenging, with progress

² <https://www.ilo.org/publications/gender-equality-and-green-jobs>

³ <https://assets.gov.ie/294400/d8a3eeb1-4e6e-4568-bca0-3b1905ae019e.pdf>

⁴ <https://www.ark.ac.uk/ARK/sites/default/files/2024-12/policybrief33.pdf>

- to date being slow. A key issue identified by some was how the production of energy can be democratised to ensure that the transition is not a case of going from large, urban, male-dominated fossil fuel companies to large, urban, male-dominated renewables companies.
- It was strongly argued that a transition that exacerbates social and economic inequalities will not be sustainable, and so how new policies are resourced is a critical issue. Costs and benefits need to be shared equitably and should avoid penalising low-income households.
 - The legacies of the conflict in Northern Ireland continue to permeate its social, economic, and political contexts (Gray et al., 2023). They have also shaped its environment, as well as action on the environment, including on climate change (Hwang, 2022).
 - How to amalgamate these equality dimensions was seen as a substantive challenge by roundtable participants. This was partly related to the poor implementation of Section 75 obligations and inadequate equality impact assessments which, among other things, do not take an intersectional perspective. That socio-economic status is not a category of Section 75 was identified by some as an important deficiency given the centrality of poverty issues in NI.
 - While a move away from fossil fuels raises concerns about job losses in some industries, more could be done to highlight the potential of job creation in clean energy. At the roundtable there was also optimism about the innovation coming from communities and from some funders, although the precarity of community and voluntary sector funding was argued to be undermining this.
 - While the Act, and its Just Transition components, is commendably ambitious, it is complex and subject to the governance vagaries of NI's political climate. Furthermore, it will require significant investment from multiple sources to implement it quickly, well and fairly. Getting this right is essential for the future of Northern Ireland: 'without demonstrable equity in the benefits and burdens of any lower carbon transition, there is a real danger for social backlash and citizen resistance' (Centre for Sustainability, Equality and Climate Action, 2021).
- We point the Department to **LucidTalk polling commissioned by National Energy Action Northern Ireland (NEA NI)** which shows the extent of fuel poverty in Northern Ireland.⁵ The Women's Regional Consortium particularly highlights the following points from this polling and supports NEA NI calls for support for the cost of a just transition:
 - Over 40% of adults say they are spending more than 10% of their total household expenditure on energy costs meaning they are fuel poor.
 - A quarter (27% of households) said they went without heating (oil/gas) or electricity at a point during the last 24 months because they could not afford the costs of energy. This figure rose from 19% when NEA NI last conducted the poll in September 2023.

⁵ <https://www.nea.org.uk/news/too-scared-to-turn-on-the-heat-40-of-northern-irish-households-are-still-in-fuel-poverty/>

- Respondents detailed a range of coping mechanisms to deal with rising energy prices and the cost of living – 70% reduced the use of central heating in their home, 36% used alternative heating sources such as coal fires and fan heaters, 36% reported sitting in a cold house wearing coats, blankets or using a hot water bottle, 27% reduced the use of hot water and 9% skipped meals.
- 11% of survey respondents said they are currently in debt, or have been in debt in the last 24 months, to their energy supplier - up from 9% last year.
- The polling showed the most popular actions the NI Assembly and NI Executive could take to assist with rising energy costs – 51% said expand schemes that provide financial support to improve the energy efficiency of homes and 49% said provide greater financial assistance with energy bills.
- The Women’s Regional Consortium supports the Commission on a Gender-Equal Economy proposals for a **Caring Economy**.⁶ As the Commission states a Caring Economy would prioritise care for each other and for the environment in which we live: *“A caring economy simultaneously ensures achievement of gender equality, sustainability and wellbeing. While these three objectives can, to some extent, be achieved separately, a caring economy allows them to be achieved together. For example, investment in paid care services improves wellbeing through ensuring that people’s care needs are met; it improves gender equality because it raises the overall employment rate and reduces the gender employment gap (which are particularly crucial as we seek to counter the looming jobs crisis), and it is sustainable because care jobs are green.”*
- Finally, we point the Department to the need for **Gender Budgeting** which has the aim of ensuring that the distribution of resources creates more gender equal outcomes. There is widespread political support for gender budgeting in Northern Ireland and a growing evidence base that it can help create a more equal society.

Kind Regards



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⁶ Creating a Caring Economy: A Call to Action, Commission on a Gender-Equal Economy, Women’s Budget Group, October 2020

<https://wbg.org.uk/wp-content/uploads/2020/10/WBG-Report-v10.pdf>