

## Response to the Department for the Economy - Energy Strategy - Call for Evidence

The Northern Ireland Marine Task Force (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB NI, Ulster Wildlife, Wildfowl and Wetlands Trust, WWF, Marine Conservation Society, Keep Northern Ireland Beautiful, National Trust, Friends of the Earth, Irish Whale and Dolphin Group and Northern Ireland Environment Link. We are working towards healthy, productive and resilient seas for Northern Ireland.

NIMTF welcomes the opportunity to respond to the Department for the Economy (DfE) *Energy Strategy - Call for Evidence*. We wish to raise a number of crosscutting points and NIMTF supports the Northern Ireland Environment Link (NIEL) response to the call for evidence.

As an island nation, the sea around us is at the heart of our culture, well-being and prosperity. Our seas support our daily lives, providing multiple resources and services including food (fish, shellfish); energy (e.g. renewable tidal and wave); reduction of climate stress (e.g. carbon regulation); coastal protection; tourism, leisure and recreation opportunities. However, our marine environment is in trouble. The UK Government's 2019 assessment of Good Environmental Status found that the UK is failing to meet 11 out of the 15 indicators for healthy seas<sup>1</sup>.

In order to tackle climate change, **we must endeavour to use energy efficiently, reduce our dependence on fossil fuels and embrace the use of clean, renewable energy sources**. On the 3rd of February 2020, the Northern Ireland Assembly declared a Climate Emergency. As part of this declaration, MLAs supported immediate action to cut carbon emissions and bring forward a Climate Change Act for NI. **An Energy Strategy for Northern Ireland must be developed in respect of the Climate Emergency to ensure the achievement of the targets in any NI Climate Change Act .**

In 2017, energy supply was the third largest contributor of greenhouse gas emissions in NI (17%)<sup>2</sup>. However, energy supply has also seen the largest decrease in terms of carbon dioxide equivalent (2017); this is a welcome trend. A future Energy Strategy for

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<sup>1</sup> <https://moat.cefas.co.uk/summary-of-progress-towards-good-environmental-status/>

<sup>2</sup> <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ghg-inventory-statistical-bulletin-2017.pdf>

NI must enable the continuation of this downward trend in order to meet the UK target of **net-zero emissions by 2050** and assist in the achievement of the **Paris Agreement target of limiting average global temperature increase to 1.5 °C**.

**The absence of bespoke climate change legislation for Northern Ireland is untenable.** A Northern Ireland Climate Change Act must be brought forward by the Assembly as a matter of urgency. Such an Act must also be supported by a suite of policies (e.g. NI Energy Strategy, NI Environment Strategy) and ambitious (i.e. SMART) targets and indicators.

We must reduce our reliance on fossil fuels and embrace the use of clean energy sources. In 2019, 44.9% of NI's electricity came from renewables<sup>3</sup>. The use of renewable energy has many potential benefits, including a reduction in greenhouse gas emissions, the diversification of energy supplies and a reduced dependency on fossil fuels (in particular, oil and gas), which in turn will save money<sup>4</sup>. **NIMTF is broadly supportive of marine renewable energy initiatives, and we recognise the importance of renewable energy in our future energy mix as a means of combating climate change. However, it is crucial that renewable energy infrastructure is appropriately located and does not damage biodiversity.**

When implemented, the Northern Ireland Marine Plan (currently in draft) should provide effective guidance for developers, planners and regulators and should be an enabling mechanism for an increase in appropriately located renewable energy where it is proposed within marine and coastal areas. The NI Marine Plan should apply an ecosystem based approach, and facilitate the coexistence of coastal and marine developments and Marine Protected Areas (MPAs). **The Northern Ireland Marine Plan must be implemented by 31st March 2021** (as per the Maritime Spatial Planning Directive 2014/89/EU). **The NI MPA network needs to be completed and management plans for all sites need to be implemented as a matter of urgency to ensure that human activities do not cause damage to our designated marine habitats and species.**

We welcome the acknowledgement for the need to ensure cross departmental working within the Energy Strategy Call for Evidence. **In order to tackle the climate and biodiversity emergency, a range of ambitious and holistic policies and legislation**

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3

<https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Issue-13-Electricity-Consumption-and-Renewable-Generation-in-Northern-Ireland-October-2018-to-September-2019.pdf>

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<https://www.msp-platform.eu/practices/current-status-and-potential-blue-economy-gulf-finland-and-archipelago-sea-indicators>

**will be required.** There must be a strong level of coherency between such policies and legislation. As an example, the NI policies which support the *Climate Change* objective under the current UK Fisheries Bill should be coherent with a future Energy Strategy for Northern Ireland and vice versa.

Finally, **we recommend that ‘energy’ be included within the future Environment Strategy for Northern Ireland and that this chapter is underpinned by the new Energy Strategy for NI.**

As our response has raised a number of crosscutting points, NIMTF has also sent a copy of this response to the Department of Agriculture Environment and Rural Affairs (DAERA).

If you have any queries about our response, please do not hesitate to contact the Northern Ireland Marine Task Force Officer.

Yours sincerely,

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