

CLIMATE ACTION PLAN FOR NORTHERN IRELAND

A green and fair recovery for people and communities.

A CLIMATE CHANGE, NATURE, AND COVID-19 RECOVERY PLAN FOR ALL THE PEOPLE AND COMMUNITIES OF NORTHERN IRELAND

The world is at a pivotal moment. Multiple crises are converging – climate breakdown, ecological collapse, a global pandemic, and growing inequalities.

Northern Ireland needs to navigate these crises within the context of being a post-conflict society and with what could be described as at best a struggling democracy and at worst a dysfunctional one.

But navigate these we must. Friends of the Earth's plan proposes how we can do this in a way that benefits all the people and communities of Northern Ireland. It unashamedly borrows ideas from other small countries, as well as promoting vibrant grassroots participation in decision-making so that home-grown solutions can emerge.

Many changes are needed if we're to promise the youngest in society that their wellbeing is at the heart of all we do. Here are Friends of the Earth's top five priorities, with further details and suggested changes later in the document.

Five priorities to get Northern Ireland on track to becoming an environmentally responsible, resilient, and fair country:

1. **Empower communities to lead the recovery** by using participatory decision-making processes, making sure those most impacted by environmental harm are listened to, and with legal changes so that communities can hold the Northern Ireland government to account. We need a democratic revival.
2. **Introduce a Wellbeing of Future Generations Bill.** Alongside the promised Climate Change Act, such legislation will ensure that the voices of young people and consideration of the wellbeing of future generations are considered properly in decision-making. A similar act has been successfully pioneered by Wales.
3. **Follow the lead of New Zealand, and instead of measuring progress and shaping economic policy towards GDP growth, develop and use a Living Standards Framework.** Gross Domestic Product is a poor measure of progress because it can increase while the environment is degraded and people's wellbeing declines. The economy and fiscal measures should be judged on how well they increase wellbeing.
4. **Power Northern Ireland with renewable electricity.** Our homes can be heated using renewable electricity and heat pumps, nearly all transport can be electric, and electricity can power much of business. Currently, the Executive is wedded to the concept of natural gas as a bridging fuel to a low-carbon energy sector. But Northern Ireland doesn't need a future dominated by fossil fuels. It already produces a higher proportion of its electricity from renewable energy than England and Wales. Oil- and gas-central heating should be phased out by 2030.
5. **Reverse the decline in nature, to include a Just Transition plan for farmers to halve livestock production by 2030, a moratorium on industrial farming, and diversification to make farming nature friendly.** This should involve restoring peatland, and ensuring family farmers in particular get rewarded for nature-friendly farming and funded to diversify, including into tree planting and timber production. And rejecting intensive livestock production, which too often relies on imported animal feed from areas of rainforest deforestation or harms nature sites through pollution.

Detailed policies and suggest changes

Governance that empowers communities and puts the wellbeing of communities and future generations centre-stage

The wellbeing of future generations requires that the global temperature increase due to climate change is kept below 1.5 degrees of warming. Doing so will also reduce the harm that we currently face from extreme weather.

The UK is not on track to meet the current climate goals enshrined in law under the Climate Change Act. In December, the Climate Change Committee will advise the UK government on a climate emissions reductions target for 2035 and the pathway towards this. It will also provide advice for the devolved nations. Northern Ireland's reduction in greenhouse gas emissions is well behind the other nations of the UK, with only a 20% reduction since 1990, compared to 31% in Wales, 45% in Scotland, and 46% in England¹. The Northern Ireland government and local authorities shouldn't exacerbate this situation by giving permission for new high-carbon infrastructure, such as fracking, gas power-stations, or new storage facilities.

The Tyndall Centre at Manchester University has recommended that Northern Ireland aims for net zero emissions by 2042 and an annual reduction rate in greenhouse gas emissions of 13.1% to deliver a carbon budget aligned with the Paris Agreement. The UK Climate Change Act applies to Northern Ireland, but the relevant areas of responsibility are devolved to the Northern Ireland Assembly, so there's no mechanism by which the targets of the UK Act can be enforced. A Northern Ireland Climate Change Act would close this legislative gap.

Achieving the scale of emissions reductions required will require cohesive, joined-up government, and community involvement and buy-in. Therefore, hearing the voices of communities, particularly those most impacted by climate change now and in the future, is essential.

In addition to a Climate Change Act, Northern Ireland should follow the lead of the Welsh government by introducing a Wellbeing of Future Generations Act that puts the interests of young people and future generations centre-stage and ensures their voices are heard. In Wales, the Act covers all public bodies and all levels of government. It requires they work towards an agreed set of wellbeing goals. The Act has also created a Future Generations Commissioner, who has made championing public participation and involvement in decision-making one of her priorities. In Northern Ireland, the establishment of a cross-department Future Generations Working Group on Climate Change is a welcome step in the right direction, but not a substitute for legislation and the establishment of a Future Generations Commissioner.

Responsibilities for climate-related policies are scattered across several Assembly departments. The mandatory coalition structure also means that climate responsibilities lie with several different parties, often with opposing policies. To ensure effective co-ordination of policies and plans, climate-related responsibilities should be placed with a new Department for Climate and Energy Transition.

Hearing the voices of those most vulnerable to climate change and other forms of environmental degradation, who are often the most marginalised and least heard, also requires more participation in decision-making, such as citizens' juries and citizens' assemblies^{2,3}. Such processes are in line with the internationally agreed Aarhus Convention on access to information, public participation in decision-making, and access to justice in environmental matters, of which the UK is a signatory.

Adhering to the Aarhus Convention is an essential component of improving governance in Northern Ireland. Alongside a better process of engagement – like citizens' juries, etc – it will also be necessary to change laws in key areas. For example:

- **Community Bill of Rights.** Using Local Authority legislative powers, communities should have the power to enact laws to protect their rights – for example, rights to clean air, clean water, health and a safe climate.
- **Planning.** Overgenerous permitted development rights, inadequate enforcement of planning conditions, a short consultation period, and a lack of an equal right of appeal for objectors means developers are playing the game with loaded dice. The system is designed to benefit them, and disbenefit local communities.

- Legal challenges. For most people, the only option for stopping developments or challenging government decisions is by Judicial Review. But JRs are daunting, costly, and Northern Ireland has no specialised environmental courts. Where Aarhus principles apply, equitable fee arrangements that improve access to justice are required, since the applicant is taking the case in the public interest and will not benefit materially from the judgement.
- Aarhus Centres are information and support resources set up by the United Nations under the Aarhus Convention. They're vital for promoting all three pillars of the Aarhus Convention – access to information, public participation in decision-making, and access to justice. Given the systemic failure of environmental governance in Northern Ireland, an Aarhus Centre would play an important role in redressing that failing.

However, proper consultation and stronger laws can only get you so far if laws are not enforced. Sadly, Northern Ireland has a shocking track-record of ensuring adherence to environmental laws. The number of unlawful and poorly regulated quarries and rubbish dumps bears testament to this failure and underlines Northern Ireland's vulnerability to mining companies and others looking for a fast buck at the expense of communities and the environment. The years of illegal sand dredging of Lough Neagh, an area of international importance for wildlife, are a stain on Northern Ireland's reputation.

Northern Ireland desperately needs a powerful, well-resourced and independent Environmental Protection Agency. The case for such an agency is already overwhelming⁴ but is strengthened further by the UK's exit from the European Union and the loss of recourse to EU legal institutions⁵.

Policy recommendations:

- **The Climate Change Bill should be swiftly passed, and a greenhouse gas emissions reduction pathway agreed based on advice from the Climate Change Committee and expert input from others, such as the Tyndall Centre. All high-carbon intensive developments should be stopped, such as oil and gas exploration, fossil fuel storage facilities, and waste incineration.**
- **A Wellbeing of Future Generations Act should be passed, modelled on the successful Welsh version.**
- **Communities should be empowered to protect and improve the environment through:**
 - **the use of participatory decision-making processes such as citizens' assemblies;**
 - **changes to planning law so that community input to decision-making is required and permitted development is restricted to minor works;**
 - **and communities having affordable legal recourse to challenge poor decision-making.**
- **A powerful and well-resourced Environmental Protection Agency is set up with a remit to immediately institute action against existing unlawful activities, as well as ensure adherence to existing environmental protections after Brexit.**
- **A new Department for Climate and Energy Transition should be created to ensure effective co-ordination of climate-related policies and plans.**

An economy that works for people and the planet

“It's the economy, stupid” was the catchphrase that helped get Bill Clinton elected in 1992 and has echoed down elections on both sides of the Atlantic since. The media and politicians of all the major political parties regularly use estimates of GDP as a measure of how well things are going.

In a foreword to the Northern Ireland Executive's Economic Strategy, Arlene Foster (then Minister of Enterprise, Trade and Investment) said, *‘The overarching goal of this Strategy is to improve the economic competitiveness of the Northern Ireland economy. In order to achieve this, we are committed to strengthening our competitiveness through a focus on export led economic growth.’*⁶

However, the Economic Strategy is in desperate need of a rewrite, not least due to the implications of Brexit and the COVID-19 pandemic. Any rewrite gives an opportunity to re-examine the primacy of economic growth and the dominance of GDP as the measure of success.

It's well-recognised that GDP is an extremely poor measure of success. GDP can grow as a direct result of polluting the environment. It fails to consider the huge contributions made by unpaid workers (often women caring for others). And it doesn't consider the growth in inequalities that can damage social cohesion and harm social mobility. Former UK civil service chief Gus O'Donnell has said the UK should look beyond GDP⁷. Nobel economics laureate Joseph E Stiglitz has said we should retire GDP⁸. Even former UK Prime Minister David Cameron thought it was a poor measure⁹.

The New Zealand government has, in a brave but sensible move, broken with tradition to say that instead of guiding economic policy by GDP growth it will instead use a Living Standards Framework (LSF) made up of 12 domains of wellbeing¹⁰. The LSF has been developed by the New Zealand Treasury, which is notable because treasuries are often the last bastions for the worship of GDP. It's early days to see whether the move by the progressive New Zealand government will successfully dethrone GDP. And it may not be perfect. But it's a very good start.

A Northern Ireland version of the Living Standards Framework should be developed in collaboration with the country's communities and replace GDP as the main measure of progress. The annual fiscal budget must then be required to align with the Living Standards Framework, as must all major policy announcements.

As the economy in every part of Northern Ireland has suffered because of the COVID-19 pandemic, the government will be looking at future investments to increase jobs. Such a plan should be in line with climate and nature goals as well as other aspects that would form a Living Standards Framework, such as addressing inequalities.

Northern Ireland can create jobs to improve energy efficiency in the housing sector and address fuel poverty. The expansion of renewable energy is already creating direct jobs, supply chain jobs, and local economic benefits, and has seen the development of energy storage technologies¹¹. Switching from a country largely powered by oil-central heating to one powered by electricity (particularly heat pumps) will support new businesses to form and existing businesses to diversify. A recent report by the IPPR Environmental Justice Commission suggested that more than 10,000 jobs could be created in Northern Ireland through energy efficiency, heating, and afforestation alone¹².

Rapidly helping the green economy grow will help people who have lost their jobs because of COVID-19 to get new jobs. Many of them will be young people. Skills training is essential for this transition, so skills programmes must be targeted at businesses of the future, not the past.

Policy recommendations:

- **The Northern Ireland government should develop a Living Standards Framework in consultation with councils, communities, and others, based on the New Zealand approach, and develop a new Economic Strategy to deliver it. GDP should be explicitly discarded as the primary purpose of economic strategy.**
- **To build back better COVID-19 recovery investment plans by the government and local authorities must focus on building the green economy of the future, like renewable energy, energy efficiency and low-carbon heating, forestry, etc.**
- **Skills and training programmes should be targeted to support the development of green businesses and green jobs.**

A country powered by renewable energy

For the 12-month period July 2019 to June 2020, 47.7% of total electricity consumption in Northern Ireland was generated from renewable power sources located in Northern Ireland. This was an increase of 3.6 percentage points on the previous 12-month period (July 2018 to June 2019). 84.8% of this renewable energy was generated from wind¹³. Clearly, renewable electricity production is a Northern Ireland success story.

Northern Ireland is now well ahead of England and Wales in the proportion of renewable electricity produced within the country, although still well behind Scotland, which produces the equivalent of 90% of the electricity it consumes through renewables¹⁴. The Northern Ireland grid can already cope with

65% renewable electricity and grid operator Soni has announced investment plans so it can be ready for 95% renewable electricity¹⁵.

The Department of the Economy states that Northern Ireland has “one of the greatest wind energy resources in Europe¹⁶.” This natural, clean, and green energy source should be utilised to replace not only fossil-fuel use in electricity production, but to power transport and provide heating. There are currently over 5,000 jobs in the renewables sector¹⁷ with significant potential to create thousands more¹⁸ and reduce energy imports.

Two-thirds of homes are heated by oil-fired central heating and heating is responsible for 50% of Northern Ireland’s energy consumption¹⁹. Currently the Northern Ireland government is actively promoting and supporting an increase in the numbers of homes and businesses on the gas network. While gas is cheaper for consumers and less carbon intensive than oil heating, it’s still a fossil fuel and a significant source of greenhouse gas emissions. Rather than investing tens of millions of pounds to extend the gas network, the focus should be on electrifying heating.

With 38% of homes detached and 28% semi-detached, Northern Ireland is well placed to switch to electric-powered heat pumps to provide heating. Heat pumps capture heat from the air outside a property and use this to heat water for radiators. For every unit of electricity used they provide 3 units of heat. They work in the depths of winter and are a popular form of heating in countries such as Sweden. While a small capital grant is available for the installation of heat pumps, a more generous grant together with more active promotion is needed, given the upfront cost of heat pumps is high. Northern Ireland has the lowest average disposable income per household in the UK alongside Wales, and it’s unrealistic to expect householders to be able to afford the capital costs of heat pumps²⁰.

As the electricity grid is increasingly powered by renewable energy, heat batteries and storage heaters also become a better bet than natural gas in carbon-saving terms. Hydrogen produced by renewable power can also be used in properties where heat pumps or electric heating isn’t suitable, or in combination with hybrid heat pumps during periods of high heating demand. A requirement to completely phase out the use of oil and natural gas heating by 2030 is needed.

Like other forms of heating, heat pumps work most cost effectively in well-insulated homes. Only 49% of homes across Northern Ireland are well insulated (EPC C rating or above)²¹, although this is a higher proportion than in England (approx. 30%). This represents a shocking waste of energy, high greenhouse gas emissions, and unnecessarily high energy bills. 22% of households in the country are in fuel poverty, which means they can’t afford to heat their homes properly²². Poor insulation contributes to this problem. 38,715 homes need upgrading every year to ensure all homes are properly insulated by 2030 and to bring as many people as possible out of fuel poverty. Yet only £8 million funding is provided each year to help the domestic and commercial sector with energy efficiency. This figure needs to increase significantly, either through a levy on fossil fuels or through central taxation. As in Scotland, the Northern Ireland government should use regulatory powers to ensure the private rented sector improves energy efficiency in line with the 2030 EPC C target, as well as measures to encourage the owner-occupied housing sector²³.

Transport can also be largely electrified, including HGVs. For example, Scania has revealed plans to launch a range of fast-charging electric long-distance HGVs within the next few years²⁴. The UK government is reportedly considering a 2030 phase-out date for the sale of new petrol or diesel cars and vans.

With average journey distances low in Northern Ireland (the average is 10.5 km), Northern Ireland is well placed to switch many journeys from cars to cycling and walking. In Copenhagen, roughly twice the size of Belfast, approximately 40% of commuter trips are by bike. E-bikes open the potential for longer journeys, with a German study showing average journey lengths in the area studied were 11.4 km (7 miles) compared to 7.1 km for a conventional bike²⁵. Good quality segregated cycleways are key to achieving higher cycling rates. The recent appointment of a Walking and Cycling Champion in the Department of Infrastructure is a welcome step.

Countries such as Switzerland have also successfully increased public transport. The Zurich canton has introduced universal service standards enshrined in law, which enable convenient travel between any places bigger than a small village. The standards are:

- Settlements >300 people – hourly service.
- Corridors where multiple settlements provide strong demand – service every 30 minutes.
- Large dense settlements – services at least every 15 minutes.
- Services run 6am to midnight, seven days a week.
- Buses and trains connect.
- Services repeat hourly at regular intervals on a “clock-face timetable”.

Northern Ireland should not only rapidly facilitate a shift to electric vehicles, but once the COVID-19 pandemic recedes it should also facilitate a shift to public transport through setting a universal service standard and a shift to cycling through the development of an extensive network of segregated cycleways. Everybody should have the ability to travel without the need to own a car.

Policy recommendations:

- **Northern Ireland should commit to an electricity-first energy strategy (backed up by green hydrogen²⁶).**
- **Over the next 10 years all use of natural gas and oil heating should be phased out. Heat pumps should be used to replace oil central-heating in the two-thirds of homes that use it. No more gas-boilers should be fitted, except in cases where heat pumps or electric heating are not suitable.**
- **Energy efficiency should be prioritised, with the aim of ensuring all domestic properties are insulated to EPC C rating by 2030. Transport should be electrified and a significant shift from car to public transport, cycling and walking must be achieved.**

Nature protected for future generations through everything we do, including nature-friendly farming as the norm

Nature isn't a “nice to have”. Healthy ecosystems are essential to human wellbeing, including through food production, flood alleviation, and freshwater provision. The science on this is clear, including the ground-breaking work of scientists detailed in the global Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services report in 2019²⁷. The COVID-19 pandemic has also enhanced people's appreciation of wildlife, particularly in our towns and cities.

But all too often in Northern Ireland, nature is seen as of secondary importance or worse still as an inconvenient barrier to infrastructure development. One example is the A6 dual carriageway scheme, where a flood plain and internationally important feeding site for whooper swans was bulldozed to make way for a stretch of road that would shave just 1 minute off the commute between Belfast and Derry. The shocking decision to legalise the extraction of sand in Lough Neagh is another case in point. The fact that the government has not met 37 of 42 of its own targets for biodiversity is scandalous²⁸, especially given the targets themselves were unambitious.

Protecting and restoring nature needs to be at the heart of decision-making, including in important economic sectors such as farming.

Protecting nature and habitats is also good for climate change. This is particularly true of peatland. In Northern Ireland, peatlands cover 18% of land surface, of which two-thirds is blanket bog, and hold an estimated 40% of our soil carbon stock. The condition of peatland across the country is poor. It has been estimated that degradation of peatlands adds 10% to Northern Ireland's emissions. On the other hand, well-managed peatland is great for nature, acts as a sponge to soak up extreme rainfall and prevent flooding, and draws down carbon from the atmosphere. The government has promised to consult on a Northern Ireland peat strategy in 2020. Friends of the Earth is calling for interim and long-term targets and funding, so that all uplands are restored to be at least carbon neutral by 2040, as well as a ban on all peat extraction except traditional hand-cutting for domestic use.

Farming, nature and climate change are however the areas with greatest potential to enhance nature and reduce greenhouse gas emissions while ensuring a vibrant farming economy. It's a false dichotomy to pitch the environment against farming when nature-friendly farming can deliver both.

Currently, farming is responsible for 27% of Northern Ireland's greenhouse gas emissions. The vast majority of this is due to methane emissions from livestock. Meat and dairy production represent 83% of agriculture's economic output²⁹. Like other sectors, it's also responsible for emissions in other countries due to imports. In agriculture these are predominately related to the import of animal feedstock. The excellent RSPB/WWF report Risky Business highlights the massive global biodiversity impact from UK imports of 7 commodities (soya, timber, etc). Although not quantified by individual UK countries, Northern Ireland will undoubtedly be contributing to this impact. Its sizeable livestock sector requires large supplies of animal feed, which cannot be met by domestic supply alone, and it imports maize and soybean products from the United States and South America, as well as barley and wheat from western Europe³⁰.

The Climate Change Committee will make recommendations for agriculture in Northern Ireland when it provides bespoke advice to the government alongside its Sixth Carbon Budget recommendations in December 2020. An earlier report it produced on land-use recommended the inclusion of methane inhibitors in animal feed, a reduction in production and consumption of meat and dairy, and farmland diversification with increased tree planting (including for timber production).

Friends of the Earth is calling for a 50% cut in meat and dairy consumption by 2030. In Northern Ireland, this would require a significant change in this sector. Currently Northern Ireland exports £1 billion of beef and sheep, of which over 80% goes to the rest of the UK.

A "Just Transition" plan is needed for Northern Ireland farmers to enable them to adapt and change, including tenant farmers who have short tenancies and therefore disincentives to invest for the future.

It's especially important that Northern Ireland's 25,000 family farms are financially supported to diversify into producing meat and dairy less intensively, to develop new income streams (such as timber production, including in shelter belts), and to financially support them to protect and enhance nature while doing so.

The new agriculture strategy that will need to be produced post-Brexit must be focused on a just transition for farmers so that they can diversify to more mixed farming and less intensive animal rearing. This will reduce greenhouse gas emissions and biodiversity impacts from livestock production, both in Northern Ireland and from feed imports.

The new strategy must not continue along a trajectory that favours more intensive farming and exacerbates global biodiversity loss and climate change. 98% of protected nature sites, including Special Protection Areas and Special Areas of Conservation, are being damaged by excess ammonia from intensive factory farms. There should be a moratorium on new factory farms, and in addition existing units must be properly regulated, and closed down when they're unable to meet high environmental and animal welfare standards.

Recommendations:

- **A new peatland strategy must be produced that aims to ensure all upland peat is at least carbon neutral by 2040, with interim targets and funding.**
- **A just transition plan must be produced and funded to support the diversification of farming. This should aim to reduce livestock numbers by around 50% by 2030, with remaining livestock raised less intensively and requiring fewer animal feed imports. There should be a moratorium on new factory farms. Tree planting, including to produce timber, should be rewarded. Nature-friendly farming must become the norm.**
- **A restoration strategy for degraded habitats, with legally binding targets for the regeneration of declining species, should be produced.**
- **Using local authority powers, communities can introduce laws that recognise rights of nature – such as the right to exist, to thrive, to evolve, to regenerate, and to be restored.**
- **Lough Neagh and the rivers that feed it should be taken into community ownership, with a rewilding strategy to restore this most degraded wetland system. Lough Neagh should have its own legal rights to evolve and flourish³¹ and to be designated Ireland's first peace park³², an ecosystem with a new vision for ecological restoration and as a space for community reconciliation.**

Waste

Northern Ireland has a household waste reuse, recycling, and composting rate of 47%, higher than the rate in England, but lower than Wales. Wales has set its local authorities a target of 70% reuse, recycling, and composting by 2025. Northern Ireland local authorities should aim for the same figure.

But the biggest waste issue in Northern Ireland is its history of illegal waste dumps. Across the whole of the country, illegal waste dumping was a lucrative industry for those engaged in it. At least 750,000 tonnes of waste have been illegally dumped since 2008³³, imperilling water quality (including drinking water) and nature. How such an activity could continue for so long without proper enforcement requires an independent public inquiry, which the government is so far refusing. These illegal waste dumps are a toxic legacy that will take tens of millions of pounds of public money to make safe and clean up. Lax regulation of waste and other areas, such as mineral extraction, reinforces the need for a strong, well-funded, and independent Environment Protection Agency.

Recommendations:

Northern Ireland should:

- **Aim to recycle 70% of waste by 2030.**
- **Adopt a circular economy strategy**
- **Hold a public inquiry into illegal waste dumping. And form an independent, powerful, and well-funded Environmental Protection Agency tasked with bringing illegal waste dumping to an end.**
- **Set up a Contaminated Land Register under Part III of the Waste and Contaminated Land (Northern Ireland) Order 1997. This would ensure contaminated land such as abandoned landfill sites could be regulated and decontaminated to prevent ongoing pollution, including the release of greenhouse gases.**

Conclusion

These are undoubtedly difficult times. They are also times of hope and opportunity. We can shape the future we want, collectively – a life-affirming future with a life-sustaining economy, a functioning participative democracy, and a healthy planet. We can build back better. We can create a society and an economy that serves the needs of people and planet, not people and planet serving the needs of the economy. We have to grasp the opportunity.

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