RenewableNI

Public Consultation on Northern Ireland's draft

Climate Action Plan 2023-2027

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Consultation on Northern Ireland's draft Climate Action Plan 2023-2027

1. **To what extent do you agree with the quantification methodology used to calculate emissions reductions from policies and proposals?**

Strongly agree **Agree** Neither agree nor disagree Disagree Strongly disagree

RenewableNI agrees with the quantification methodology used to calculate emissions reductions from the policies and proposals laid out in the Climate Action Plan (CAP).

RenewableNI agrees with using a sector-specific approach to assessing emissions reductions. RenewableNI agrees with how the nine different sectors have been split, with Energy Production and Supply covering all electricity production and Business and Industrial Processes primarily covering stationary combustion in industrial and commercial sectors along with other industrial emissions and the Residential Buildings and Public Buildings sectors covering fuel combustion for heating, cooling, and hot water in buildings. This approach reduces the risk of overlap and of double counting emissions. It also makes it clearer the actions which need to be taken to achieve net zero in each sector.

RenewableNI agrees with maintaining maximum possible compatibility with the Northern Ireland Greenhouse Gas (GHG) Inventory. As stated in the draft CAP, the Northern Ireland GHG Inventory emissions estimates are the metric stipulated in the Climate Change Act for achieving carbon budgets. Secondly, as this methodology was produced along the guidelines issued by the United Nations Framework Convention on Climate Change and the UK GHG Inventory Reporting Protocol, this will allow Northern Ireland to meaningfully compare progress in reducing greenhouse gas emissions with other parts of the UK and globally. Although the Northern Ireland GHG Inventory statistical bulletins have been changed to reflect changes in emissions reporting in the UK GHG Inventory, RenewableNI agrees with mapping the new Territorial Emissions Statistics (TES) back to the original National Communication (NC) sectors to maintain alignment with the Climate Change Act.

RenewableNI agrees with using the Department for Agriculture, Environment and Rural Affairs (DAERA) GHG Emissions Projection Tool to combine sectoral analyses of greenhouse gas emissions into an estimate of total emissions for Northern Ireland. However, DAERA's emissions projections for the Energy Production and Supply sector are 12.33 $MtCO_2e$ while the projections from the Climate Change Committee (CCC) are 12.85$MtCO_2e$. The reason for this difference in projections is not clear and RenewableNI would encourage the reason to be made clear so that emission projections are consistent when compared with the rest of the United Kingdom.

RenewableNI agrees with minimising double counting of emissions savings through apportioning savings from policies and proposals across sectors and of excluding policies and proposals from emissions reductions calculations where there is an unacceptable risk of double counting.

RenewableNI agrees with using sector-specific Northern Ireland/UK scaling ratios where UK wide policies apply to Northern Ireland, to determine the proportion of total UK emissions in each sector were emitted in Northern Ireland.

2. **Do you have any comments on the quantification methodology used to calculate emissions reductions from policies and proposals?**

While RenewableNI agrees with the overall methodology used to quantify emissions reductions, we have a comment on the electricity demand forecasts set out in Annex A. These forecasts, drawn from the 'central demand forecast' in the System Operator for Northern Ireland's (SONI) most recent All-Island Generation Capacity Statement, project electricity consumption in Northern Ireland to increase by just over 15% from 8.35TWh in 2022 to 9.66TWh in 2027.

However, data from the Department for the Economy's (DfE) Energy in Northern Ireland Report (published June 2025) (Electricity Consumption and Renewable Generation in Northern Ireland) shows a steady decline in electricity consumption since 2015. Contrary to SONI's forecast, the DfE data shows electricity consumption has continued to fall between 2022 and 2025. Specifically, for the period April 2024 to March 2025, actual consumption was 7,262GWh (equivalent to 7.26TWh), lower than SONI's forecast of 8.62TWh for the same year. This is a difference of 1.35TWh, meaning actual consumption was approximately 16% lower than SONI's forecast.

SONI's projections are based on anticipated demand growth from new loads such as data centres and increased electrification of heat and transport. However, given that the CAP period runs only to 2027, it seems unlikely significant demand increases will materialise within that timeframe. There is currently no data centre strategy in place in Northern Ireland, a grant scheme for heat pumps is yet to be implemented, and the UK Government's grant scheme for electric vehicles was only recently introduced. These factors suggest the expected ramp-up in electricity demand may take longer to emerge than previously assumed. RenewableNI would like to know what mechanisms will be in place under the CAP to monitor actual electricity demand and ensure planning assumptions remain aligned with real-world trends. In this context, we also advocate for the development of a demand plan. This would allow for more accurate forecasting and monitoring of electricity demand in Northern Ireland.

RenewableNI has a comment on the deployment assumptions for renewables set out in Annex A. The assumptions are that by 2027 there will be 1,280 GWh of wind and 320GWh of solar by 2027, in line with meeting the 80 by 30 target. The assumptions are based on achieving 1000GWh through the Renewable Electricity Price Guarantee (REPG) and 600GWh through Corporate Power Purchase Agreements (CPPAs). Given slippage in the timeline for the REPG auctions and the lack of a strong CPPA market, as demonstrated by the low number of renewable energy projects developed since the Northern Ireland Renewables Obligation (NIRO) scheme closed to new projects in 2017, these deployment assumptions will be incredibly difficult to achieve. There must be no further slippages in timelines. Key pieces of policy and legislation (such as the review of planning policy for renewable and low carbon energy and the REPG), must be published, legislated on, and delivered as quickly as possible to have a chance of achieving these figures. Developing a demand plan for Northern Ireland would also be helpful in supporting the development of the renewable electricity industry.

3. **To what extent do you agree or disagree that the proposed policies and proposals will effectively reduce emissions for the energy sector?**

Strongly agree **Agree** Neither agree nor disagree Disagree Strongly disagree

While RenewableNI strongly agrees and agrees with most elements of the proposed policies and proposals laid out in the CAP to reduce emissions in the Energy Sector, we have concerns in regard to timelines. RenewableNI's main concern is that in order to meet the statutory 80 by 30 renewables target the timelines in delivering most of these actions must not slip.

Policy:

RenewableNI strongly agrees with ensuring the NIRO scheme continues to provide support to accredited renewables projects for twenty years or until March 2037, whichever is sooner. As stated in the CAP, the NIRO support scheme was crucial in increasing renewable energy production in Northern Ireland from 3% of generation in 2005 to 46% in 2020. Although the scheme closed in March 2017 for new projects, continuing support for accredited projects will be crucial in achieving emissions reduction targets in this and future carbon budget periods.

Proposal:

Since the end of the NIRO support scheme in March 2017, construction of new renewable energy projects in Northern Ireland has seriously declined, with only five new wind farms having been constructed this decade. This means there has only been 156MW of capacity added this decade, compared to the 400MW/yr of wind and solar needed to meet the 2030 target. Furthermore, after reaching a peak of over 50% of generation in 2022, renewables as a share of Northern Ireland's electricity mix have declined, with the latest statistics showing that from April 2024 to March 2025 43% of electricity generation in Northern Ireland was from renewables.

RenewableNI strongly agrees with the implementation of a new support scheme, based on the Contracts for Difference (CfD) model, to reverse this trend and meet emissions reduction targets in the energy sector. As stated in RenewableNI's Accelerating Renewables in Northern Ireland report, 2016 (the year before NIRO ended) saw the peak of renewables deployment in Northern Ireland, with 400MW developed in that year. The four years after saw only 70MW deployed, showing how crucial an effective support scheme is in the deployment of renewables. In a survey of renewable investors and developers, 82% said Northern Ireland was not an attractive place for renewables development and 37% felt that lack of government support was the main barrier to development. To meet the statutory target of 80% renewables by 2030, a new support scheme must be legislated and implemented as quickly as possible to enable projects to progress through the auction process and be constructed by 2030. In September 2024, the DfE's 2024/25 Business Plan & Three-Year Forward Look identified finalising the REPG and revising grid connection policy as key actions to deliver 80 by 30. RenewableNI welcomed the publication of the REPG Final Design in September 2025, and now strongly encourages the speedy introduction and implementation of the necessary legislation to put the scheme in place. This will bring Northern Ireland into line with neighbouring jurisdictions in Great Britain and the Republic of Ireland, where market stabilisation measures are already in place.

In parallel, urgent delivery of grid infrastructure is essential to effectively utilise any extra generation. SONI has acknowledged that a "business as usual" approach is insufficient, yet estimated completion dates for projects that have been termed as 'key enabler' projects for 80 by 30 - such as the Northwest of NI 110kV Reinforcement and the Mid-Tyrone Project - have recently been pushed back by three and four years respectively, while the North Sperrins Generation Substation still lacks a firm delivery date. Many of these projects remain stuck in the planning system or have been beset by other delays, creating further uncertainty and delivery

risk. Without accelerated progress on both policy and infrastructure, the persistent gap between commitments and delivery will jeopardise the 2030 renewables target and weaken investor confidence in Northern Ireland's energy transition.

Enabling Actions

RenewableNI supports a range of actions, both to enable the implementation of the REPG and to support this carbon budget but also to support future carbon budgets. This includes measures such as facilitating Long Duration Energy Storage (LDES), building the North-South Interconnector, and planning reforms to ensure renewable energy projects are processed quickly through the system. Additional enabling actions would include supporting the repowering of existing projects as they come to the end of their lifecycle and working with the Forest Service to enable the development of renewable energy projects on Forest Service Land.

RenewableNI agrees with the publication of a Smart Systems Flexibility Plan in order to both maximise the use of renewable electricity and reduce the need for fossil fuel generation and to help consumers save money through off peak pricing.

RenewableNI supports the goal of facilitating greater connection of energy storage facilities to the network and sees LDES as vital to Northern Ireland's renewable ambitions. LDES plays a critical role in integrating variable renewable generation, enhancing security of supply, and ensuring self-sufficiency in the electricity system. By storing excess renewable electricity during periods of high generation and discharging it when demand is high, LDES can significantly reduce grid constraints, lower dispatch down levels, and improve overall system efficiency. This in turn will enable more renewable generation to connect to the network, maximising the value of Northern Ireland's indigenous renewable resources and reducing reliance on fossil fuels and interconnector imports. Achieving this will require a fully coordinated and joined-up approach between government departments, SONI, NIE Networks, and the Utility Regulator, with each body moving forward in alignment rather than sequentially. Clear communication of objectives, timelines, and responsibilities will be essential to ensure that work on system needs, procurement design, and enabling policy happens in parallel. The forthcoming Non-Fossil Flexibility Needs Assessment, which must be completed under EU regulations and reported on by July 2026, will be an important step in identifying system requirements. However, SONI's own plans envisage LDES commissioning in Q4 2030, meaning the assessment, the design of procurement mechanisms, and any required legislation must be progressed in tandem, or as close to in tandem as possible. This level of coordination will ensure that once the needs are confirmed, the policy, regulatory, and legislative frameworks are already in place to support timely procurement and delivery of LDES - maximising its potential to cut constraints, enable more renewable generation, and strengthen Northern Ireland's energy security.

RenewableNI supports DfE working to facilitate the participation of aggregators in the electricity market to reduce peak demand, increase the utilisation of renewable energy, and lower energy costs.

RenewableNI agrees with the digitalisation of the grid system.

RenewableNI strongly supports delivery of the second North–South Interconnector, recognising its critical role in reducing grid constraints and enabling more renewable electricity to be brought onto the system. The project will significantly enhance cross-border electricity flows, improving system stability and facilitating the integration of low-cost renewable generation. It is crucial not only for Northern Ireland but for the electricity system across the island of Ireland.

However, it has faced persistent delays over many years, which have hindered progress toward 80 by 30. These delays are a clear example of the gap between stated policy priorities and real-world delivery. Accelerating its completion must remain a top priority to unlock renewable potential and deliver the wider benefits of an integrated, flexible, and decarbonised electricity system. While the second North–South Interconnector should be advanced without delay, RenewableNI considers further interconnection with Great Britain to require careful consideration. The proposed 700MW LirIC interconnector, for example, raises concerns about the impact of additional GB interconnection on Northern Ireland's renewable sector. Adding further interconnection capacity risks exacerbating existing grid constraints and increasing dispatch down, particularly when grid capacity is already insufficient to accommodate current generation and more renewable capacity is due to be built in the coming years. The recent trend of record interconnector imports, even during periods of high wind generation, underlines the need to address internal system constraints first. Priority must therefore be given to reinforcing Northern Ireland's grid - including completing the second North–South Interconnector - improving cross-zonal trades, reducing minimum generation levels, and optimising use of the existing North–South Interconnector before pursuing any additional interconnection with Great Britain.

RenewableNI welcomes the acknowledgement in the CAP of the important role of planning policy and planning decisions in enabling the delivery of climate action. In terms of decarbonising Energy Production and Supply, planning policy and decisions are crucial in enabling the deployment of renewable energy and the expansion of key transmission and distribution infrastructure. There are significant problems within the planning system, meaning RenewableNI would disagree that it is currently fit for purpose. On average, it takes almost three years for decisions to be made on wind farm applications, well beyond the target of 30 weeks and the worst timeline in the UK. While the consultation on a revised Strategic Planning Policy Statement (SPPS) was closed in June 2023 and a paper in response to that consultation has been tabled multiple times at the Executive since September 2024, that paper has not yet been published. Without an effective planning policy, Northern Ireland will not deploy enough renewables to achieve the 80 by 30 target and will not achieve the emissions reductions in the energy sector required by the CAP.

RenewableNI agrees with the DfE and the Utility Regulator collaborating to review the legislative and regulatory framework for electricity connections charging. We press for the final decision paper on this review to be published as soon as possible, after having been delayed from being published in the first quarter of 2025.

RenewableNI agrees with Northern Ireland Electricity Networks developing a plan for the deployment of smart meters to enable consumers to take control of their energy use and save money.

RenewableNI strongly agrees with the publication and implementation of a Renewable Energy Support Scheme in Northern Ireland. As mentioned above, the end of the previous NIRO support scheme for new projects in 2017 was highly detrimental to the deployment of renewable energy in Northern Ireland. RenewableNI welcomes the publication of the REPG Final Design and believes the support scheme must be legislated on and the first and second auctions implemented as soon as possible. With the current timeline of legislation being introduced to the Northern Ireland Assembly in autumn 2025 and the first auction being held in 2027, it will be very incredibly difficult to meet the 80 by 30.

It is essential these timelines do not slip any further. Auctions are unpredictable and it is vital that there is time to revise the parameters for the second auction, should the first auction not prove to be successful. Should the timeline for the auctions slip any further, there will be insufficient time for successful projects to construct to meet the 80 by 30 target. Should the first auction slip we risk merging the two auctions which would then not allow for any market correction and would result in significant supply chain bottle necks from a large number of projects all seeking to construct and connect at one time.

RenewableNI supports the fact that the Offshore Renewable Energy Action Plan (OREAP) is included in the CAP. While the delivery of offshore wind will be outside of the first carbon budget, RenewableNI would like to emphasise there are actions (such as setting up a renewable electricity support scheme and passing the Offshore Renewable Energy Bill, now not scheduled to be introduced to the Assembly until early 2026) that need to take place before the end of 2027 in order to enable the delivery of offshore wind in the early 2030s.

RenewableNI has a final comment that the CAP is an opportunity to be a lot more aspirational. For example, the Republic of Ireland CAP has a very aspirational target-led approach, with specific capacity targets for different renewable technologies. Having clear capacity targets for different renewable technologies would enable the CAP to be more ambitious and would enable it to be more robustly defended in court.

4. **To what extent do you agree with the proposed approach to achieving a just transition in the energy sector?**

Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree

RenewableNI agrees with the focus on affordability, fairness, and putting consumers at the centre of the energy transition.

RenewableNI strongly agrees with the need for an expansion and investment in green skills in order to enable the development of renewable energy. This includes general business and IT skills as well as specialist skills in renewable energy, such as engineering. In addition to working with young people to ensure they are informed of career pathways in the renewable energy industry, RenewableNI also believes there should be a focus on people with existing relevant skills in other industries who wish to change career. RenewableNI would also encourage there to be a focus on diversity and inclusion across the renewables sector.

RenewableNI strongly agrees that the continuation of the NIRO support scheme for accredited projects will continue to support jobs in operations and maintenance roles while a new Renewable Electricity Support Scheme will support investment and the creation of green jobs in Northern Ireland.

RenewableNI strongly agrees with a programme of skills and workforce development programme being developed via the OREAP to ensure the renewable energy sector has the workforce it needs to expand and to ensure people in Northern Ireland can take advantage of the opportunities arising from the energy transition. The Offshore Wind Industry Council's (OWIC) occupational mapping tool could be useful in supporting this skills and workforce development programme.

RenewableNI welcomes the setting up of a Just Transition Commission to oversee the implementation of the just transition elements of the CAP. RenewableNI and the wider renewables industry would be happy to contribute to the Commission once it is set up.

A wide range of departments and bodies are responsible for achieving a just transition in the energy sector. We have seen in the UK the setting up of the Solar and Onshore Wind taskforces, now councils, which are working closely with the Clean Power Unit. The Clean Power Unit brings together the different departments involved in achieving these shared goals, allows for collaborative problem solving, and holds them to account. Something like this, as well as the entrenched engagement with industry via the task force, should be established in Northern Ireland to achieve the transition.

5. To what extent do you agree with the proposed policies and proposals to reduce emissions for the transport sector?

RenewableNI supports the policy to switch transport fuels to zero and low emission alternatives. While the policy does include measures to spread the use of electric vehicles, such as through the Vehicle Emissions Trading Scheme (VETS) (Amendment) Order 2024 and through supporting the commercial development of charging infrastructure, RenewableNI believes it is worth emphasising in the CAP that electrification will be the main way that switching fuels will reduce transport emissions in Northern Ireland. The Climate Change Committee's latest Northern Ireland Report on the Fourth Carbon Budget (published in March 2025) states that electric technologies are the "clear low-carbon technology choice" for surface transport and home heating and that emissions reductions in the transport sector will be primarily driven by the uptake of electric vehicles. The fact electrification will play such a key role in decarbonising transport makes it more important to decarbonise the power sector first and expand renewable energy generation so there is the clean power in place to support an electrified transport system.

6. To what extent do you agree with the proposed approach to achieving a just transition in the transport sector?

7. To what extent do you agree with the proposed policies and proposals to reduce emissions for the business and industrial processes sector?

8. To what extent do you agree with the proposed approach to achieving a just transition in the business and industrial processes sector?

9. To what extent do you agree with the proposed policies and proposals to reduce emissions for the residential buildings sector?

RenewableNI welcomes measures to encourage the uptake of electric heat pumps in the residential buildings sector, through the Clean Heat Market Mechanism policy and the Affordable Warmth Scheme proposal. RenewableNI welcomes the recognition that while heat networks and district heating may be implemented where appropriate, the deployment of heat pumps will be a significant driver in decarbonising the Northern Ireland residential heating system. As mentioned previously in reference to electrifying the transport system, the fact that

electrifying the heating system will play such a significant part in the sector's decarbonising makes it more important to decarbonise the power sector through the expansion of renewable energy.

10. To what extent do you agree with the proposed approach to achieving a just transition in the residential buildings sector?

11. To what extent do you agree with the proposed policies and proposals to reduce emissions for the public buildings sector?

12. To what extent do you agree with the proposed approach to achieving a just transition in the public buildings sector?

13. To what extent do you agree with the proposed policies and proposals to reduce emissions for the waste sector?

14. To what extent do you agree with the proposed approach to achieving a just transition in the waste sector?

15. To what extent do you agree with the proposed policies and proposals to reduce emissions for the agriculture sector?

16. To what extent do you agree with the proposed approach to achieving a just transition in the agriculture sector?

17. To what extent do you agree with the proposed policies and proposals to reduce emissions for the LULUCF sector?

18. To what extent do you agree with the proposed approach to achieving a just transition in the LULUCF sector?

19. To what extent do you agree with the proposed policies and proposals to reduce emissions for the fisheries sector?

20. To what extent do you agree with the proposed approach to achieving a just transition in the fisheries sector?

21. To what extent do you agree with the key findings of the Financial, Social and Economic Impact Assessments that have been carried out on the policies and proposals within the draft Climate Action Plan?

22. To what extent do you agree with the key findings of the overarching Financial, Social and Economic Impact Assessment of the draft Climate Action Plan?

23. To what extent do you agree with the key findings of the Equality Screening and Equality Impact Assessment?

24. To what extent do you agree with the key findings of the Rural Needs Impact Assessments –that have been carried out on the policies and proposals in the draft Climate Action Plan?

25. To what extent do you agree with the key findings of the overarching Rural Needs Impact Assessment of the draft Climate Action Plan?

26. To what extent do you agree with the key findings of the Strategic Environmental Assessment?

RenewableNI welcomes the fact that the Strategic Environmental Assessment acknowledges the positive impacts renewable energy developments can have on the environment, such as increasing biodiversity through Biodiversity Net Gain (BNG) requirements and a reduction in air pollution due to the replacement of fossil fuels. RenewableNI also welcomes that while the Strategic Environmental Assessment (SEA) identifies potentially negative impacts of renewable energy development (such as habitat loss and visual amenity), it acknowledges these can be mitigated with suitable actions (such as appropriate siting of developments).

27. To what extent do you agree with the key findings of the Habitats Regulations Assessment?

- does anyone in the planning group have a comment on this?

28. To what extent do you agree with the key findings of the Regulatory Impact Assessment?

29. To what extent do you agree with the key findings of the Child Rights Impact Assessment?

30. Can you provide any further information which will help to supplement the completion of these impact assessments?

31. To what extent do you agree with the proposed target for Soil Quality?

32. To what extent do you agree with the proposed target for Biodiversity?

RenewableNI welcomes the fact the CAP acknowledges that the major threat to biodiversity is climate change. We also welcome the fact that there are tangible biodiversity targets within a clear timeframe. We support the proposed targets for 65% of designated features in protected sites to be approaching favourable conservation condition and for 12% of all land, freshwater, and marine environments to be effectively managed and conserved for nature by 2027.

33. To what extent do you agree with the proposed target for Air Quality?

34. Can you provide any further information which will help us to incorporate Nature-based Solutions into our policies and proposals?

35. To what extent do you agree with the proposed governance arrangements to support the delivery of the Climate Action Plan?

RenewableNI supports the proposed governance arrangements to support the delivery of the CAP. We particularly welcome the fact that ownership of the CAP will lie directly with the Northern Ireland Executive, given the plan's far-reaching impact and cross-cutting nature. RenewableNI supports the establishment of a Climate Action Plan Delivery Programme Board to direct the policies and proposals included in the CAP and the establishment of the Green Growth and Climate Change Strategic Oversight Group to coordinate, direct and oversee progress on the plan's implementation. We encourage industry representation in these bodies so the renewable energy industry can provide our expertise and perspectives in these groups. However, RenewableNI would emphasise that because the CAP has been delayed we are now two years into the carbon budget period. This means these mechanisms need to be put in place

quickly to ensure the delivery of the plan, and RenewableNI believes it will be beneficial to specify in the CAP the timescales for setting up these monitoring bodies.

We could look to the UK as a good example so far in how to govern such a transition, where (as mentioned previously) the Clean Power Unit with the Solar and Onshore Wind taskforces and brings together different departments to achieve shared goals.

36. To what extent do you agree with the proposed approach to monitoring and reporting on policies and proposals?

RenewableNI agrees with the principle of producing an interim report and a final statement after the carbon budget period has ended. RenewableNI also agrees with the criteria against which progress will be measured (Sector Emissions Savings, Outcome Indicators, Policy Indicators, and Actions). However, due to the delay in the publication of the CAP the timelines laid out will need to be updated as it is unlikely an interim report will be published at the end of this year.

37. Do you have suggestions about other actions that we should be taking across the public sector?

One action which RenewableNI believes should be included in the CAP to support the deployment of renewable energy is the leasing of Forest Service and public lands for renewable energy development. The Forest Service conducted a market engagement exercise earlier in 2025 but to be confident this will be followed up, the renewable energy industry needs clear timelines on when land will be leased. Without making Forest Service land available for renewable energy development, it will be incredibly difficult to meet the 80 by 30 renewables target.

38. To what extent do you agree with the actions that we are taking to enable the transition to Net Zero?

Overall, RenewableNI agrees with the actions the CAP lays out to enable the transition to Net Zero carbon emissions. RenewableNI supports the continuation of the NIRO scheme for accredited projects, strongly supports the delivery of a North-South Interconnector, and strongly supports the publication and implementation of the Renewable Energy Support Scheme. RenewableNI welcomes the acknowledgement in the CAP of the importance of effective planning policy and looks forward to the upcoming publication of the revised SPPS. However, there have been repeated delays in renewable energy and climate related policy, such as the REPG and the revised SPPS and the CAP itself. To achieve the emissions reductions envisioned in this carbon budget period and to meet the statutory 80 by 30 target, it is vital that timelines for key policies and pieces of legislation do not slip further. As mentioned previously, if the timeline for the auctions under the REPG slips any further, there will not be time for successful projects to be constructed to meet the 2030 target. RenewableNI welcomes the measures to achieve a just transition in the energy sector, particularly measures to build up green skills and expand green jobs in Northern Ireland. RenewableNI also believes that making Forest Service land available for renewable energy development will be vital in meeting the 80 by 30 target.

RenewableNI welcomes the measures to switch transport to low carbon fuel sources but believes there should be greater emphasis on the key role electrification will play in decarbonising the sector. RenewableNI welcomes the acknowledgement on the importance of electric heat pumps in decarbonising the residential buildings sector.

RenewableNI agrees with the governance and monitoring measures laid out in the CAP, but notes that the governance bodies (the Climate Action Plan Delivery Programme Board and Green Growth and Climate Change Strategic Oversight Group) need to be set up quickly and that the timeline of the monitoring reports needs to be updated due to the delay in the publication of the CAP.

39. To what extent do you agree with the assessment of the costs of implementing this Climate Action Plan?

RenewableNI agrees that delivering the policies and proposals of the CAP will require significant capital investment from the Northern Ireland Executive. However, the Plan does not detail how the figure of £1million of capital investment from the Executive in Energy Supply and Production has been arrived at. RenewableNI would like to understand in more detail how the figures for capital investment for each sector has been arrived at. RenewableNI supports the acknowledgement in the CAP that measures such as the Renewable Energy Support Scheme will have a financial benefit through promoting economic growth and creating employment opportunities.

The CAP mentions the necessity for private investment to achieve its goals but does not specify how much will be needed or the necessary mechanisms which will attract private investment. The CAP does acknowledge that DAERA needs to understand better how to unlock the barriers to private investment. RenewableNI advocates for assessing and implementing measures to increase investor confidence in Northern Ireland as quickly as possible.

40. Do you have any other information to inform this cost assessment?