

Response to Northern Ireland’s 2030 & 2040 Emissions Reduction Targets & First Three Carbon Budgets & View on the Climate Change Committee’s (CCC) Advice Report: The path to a Net Zero Northern Ireland

“They streamed out of their schools, bubbling with excitement. Little trickles of them flowed from side streets into grand avenues, where they mingled with other streams of children and teens. Chanting, chatting, dressed in everything from crisp school uniforms to leopard leggings, the kids formed rushing rivers in dozens of cities around the world. They marched by the hundreds, thousands and tens of thousands. That day was the first ever worldwide climate strike – and it was created and run by kids.”¹

1. Introduction

The Commissioner for Children and Young People (NICCY) was established in accordance with ‘The Commissioner for Children and Young People (Northern Ireland) Order’ (2003) to safeguard and promote the rights and best interests of children and young people in Northern Ireland. Under Articles 7(2) and (3) of this legislation, NICCY has a mandate to keep under review the adequacy and effectiveness of law, practice and services relating to the rights and best interests of children and young people by relevant authorities. Under Article 7(4), NICCY has a statutory duty to advise any relevant authority on matters concerning the rights or best interests of children and young persons. The Commissioner’s remit includes children and young people up to 18 years, or 21 years, if the young person has a disability or experience of being in the care of social services. In carrying out our functions, NICCY’s paramount consideration is the rights of the child or young person, having regard to their wishes and feelings. In exercising our functions, NICCY is required to have regard to all relevant provisions of the United Nations Convention on the Rights of the Child (UNCRC).

NICCY welcomes the opportunity to respond to this consultation by the Department of Agriculture, the Environment and Rural Affairs (DAERA) informed by our work on climate justice, pollution and biodiversity loss which we recognize as the biggest systemic threat to children’s rights. This work has included:

¹ Klein, N., How to Change Everything – the Young Human’s Guide to Protecting the Planet and Each Other, (2022), p.13

- Engaging with children and young people in relation to Children as Human Rights Defenders, for example, through supporting their engagement with the UN Committee on the Rights of the Child's Day of Discussion on this matter and running a day of activities for children and young people across NI where more than a thousand young people learned about rights and their roles as Human Rights Defenders in 2019;
- Providing advice to government (in relation to the Northern Ireland Environment Strategy, Green Growth Strategy, the Circular Economy Strategy & Climate Change Reporting) and working with young people to support their engagement with government including following the 2016 Day of General Discussion on Children's Rights and the Environment;
- As members of the European Network of Ombudsmen for Children, and on the Working Group - contributing to the drafting of the synthesis report and Position Statement for the Annual General Assembly on Climate Justice in 2022. We have disseminated this to each NI Government Department including DAERA;
- Working with our Youth Panel to develop messages for government during the COP-26 conference in 2021, linking the global priorities to local action as well supporting them participate in the European Network of Young Advisors (ENYA) Forum Report 'Let's Talk Young, Let's Talk About Climate Justice' and in the first drafting process of General Comment 26;
- Working with the NICCY Youth Panel around this year's 'Clean Air Day' on the 15th of June and our intervention in the legal proceedings to compel the Department for Infrastructure to recommence diesel car emissions testing as soon as possible.

Through this work we have heard directly from hundreds of young people about how importantly children and young people across Northern Ireland place climate justice as a priority issue for government ensuring the realisation of their right to a healthy environment. Other important rights include the general principles of the Convention of the Rights of Child (CRC), that is, the right of children to be heard and to have their views given due weight (Article 12); the right of children to have their best interests as a primary consideration (Article 3); the right to life, survival and development (Article 6); and non -

discrimination (Article 2). It also includes the principle of the evolving capacities of the child (Article 5); the right to health, including a healthy environment (Article 24); and the right to be educated about the environment (Article 29).

We also acknowledge and support recognition by the UN General Assembly of the right to a healthy environment as a human right in Resolution A/76/L75.

In addition, The UN Committee on the Rights of the Child's Concluding Observations following the examination of the UK State Party published in June 2023 for the first time included environmental health and the impact of climate change on the rights of the child as a stand-alone heading.² This was in no small part due to the advocacy and work of 16 331 children from 121 countries who helped write General Comment 26.³

“In this general comment, the Committee emphasizes the urgent need to address the adverse effects of environmental degradation, with a special focus on climate change, on the enjoyment of children’s rights, and clarifies the obligations of States to address environmental harm and climate change. The Committee also explains how children’s rights under the Convention on the Rights of the Child apply to environmental protection and confirms that children have a right to a clean, healthy and sustainable environment.”

This General Comment provides authoritative guidance to governments on what they must do to protect children’s rights and this response will be informed by both its recommendations and those of the UN Committee on the Rights of the Child’s Concluding Observations.⁴ NICCY does not have the expertise to comment in detail on the specifics around carbon emissions targets and budgets and we are responding on the understanding that the UK Climate Change Committee (CCC) is making its recommendations on the best up to date science. However, we are also very mindful that, paraphrasing Chris Stark, Chair of the UK Climate Change Committee, the longer we have no government the harder it is for Northern Ireland to meet its legal obligations under the Climate Change Act; and this will lead to massive disillusionment amongst many young

² [Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland :](#)

³ [General comment No. 26 \(2023\) on children’s rights and the environment with a special focus on climate change | OHCHR](#)

⁴ [Concluding observations on the combined 6th and 7th periodic reports of the United Kingdom of Great Britain and Northern Ireland :](#)

people. This September has been the warmest on record and 2023 is firmly set to be the warmest year on record, due to the compounding effect of natural phenomena such as the El Niño event and human caused global heating. Northern Ireland must be seen to move with urgency.

2. Territorial Carbon Emissions & Carbon Budgets

*“When your bathtub is about to overflow, you don’t go looking for buckets or start covering the floor with towels – you start by turning off the tap as soon as you possibly can. Leaving the water running means ignoring or denying the problem, delaying doing anything to resolve it and downplaying its consequences.”*⁵

The CCC has set targets consistent with the legislated Net Zero target as:

- the First, Second and Third Carbon Budgets to be set at levels that have average annual reductions of 33%, 48% and 62%, on 1990 levels, respectively.
- and – the 2030 and 2040 interim targets to be set at reductions of 48% and 77% on 1990 levels, respectively.

In 2021, Northern Ireland contributed 5.3% of all UK greenhouse gas territorial emissions, which stood at 426.5 MtCO₂e. The UK in turn contributes to around 1% of global emissions. The UK is the fifth biggest historic emitter in the world as the birthplace of the Industrial Revolution. Those carbon emissions are still there in the atmosphere, and form part of the climate crisis we face today. As the Committee for the Rights of the Child stated in their General Comment 26:

*“95. The Committee calls for urgent collective action by all States to mitigate greenhouse gas emissions, in line with their human rights obligations. In particular, historical and current major emitters should take the lead in mitigation efforts.”*⁶

When we add consumption emissions, the UK’s carbon footprint nearly doubles.

⁵ The Climate Book (2022), p.202

⁶ [General comment No. 26 \(2023\) on children’s rights and the environment with a special focus on climate change | OHCHR](#)

“A territorial emissions accounting approach does not reflect the fact that there is a significant and growing demand for industrial products from the developed world and instead allocates the emissions incurred in making those products to the largely developing nations where the industrial activity occurs. This process has allowed states to defer responsibility for their growing consumption while appearing to take climate action.”⁷

“Our continued inaction on climate change is that we have left it far too late for real fairness. The people paying the price for our norms of ever-increasing consumption are not us, they are poorer, more climate vulnerable communities elsewhere, typically both low emitters and people of colour. And these vulnerable communities extend to our own children. At the same time as we shower them with gifts, drive them to school and take them on foreign holidays, we are hugely discounting their future. When we high-emitting parents are pushing up the daisies, our own offspring and grandchildren will be battling with, and sometimes dying from, our explicit choice to take the easy route, to believe in technical utopia and to point the finger of blame at others.”⁸

Across the UK there has been a 47.7% reduction in emissions between 1990 and 2021. During the same period, the reduction in emissions in Northern Ireland was 23.2%, compared to 50.2% in England, 49.3% in Scotland and 35.0% in Wales.⁹

This demonstrates the scale of the challenge facing Northern Ireland driven both by the significant role played by agriculture, as the highest emitting sector in our economy, and the failure of political leadership over the years through the frequent absence of a NI Executive.

NICCY agrees with the CCC advice on the targets and budgets as set out in the Climate Change Act and we refer DAERA to the following recommendation in General Comment 26.

⁷ The Climate Book (2022), p.257

⁸ The Climate Book (2022), p.207

⁹ [Northern Ireland and Net Zero \(niassembly.gov.uk\)](https://www.niassembly.gov.uk) Northern Ireland accounted for 4.3% of total UK greenhouse gas emissions in 2018 and produced the equivalent of 10.3 tonnes of CO₂ per person compared with a UK figure of 6.8 tonnes of CO₂ per person.

*“98(b) States have an individual responsibility to mitigate climate change in order to fulfil their obligations under the Convention and international environmental law, including the commitment contained in the Paris Agreement to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels by 2030. Mitigation measures should reflect each State party’s fair share of the global effort to mitigate climate change, in the light of the total reductions necessary to protect against continuing and worsening violations of children’s rights. Each State, and all States working together, should continuously strengthen climate commitments in line with the highest possible ambition and their common but differentiated responsibilities and respective capacities. High-income States should continue to take the lead by undertaking economy-wide absolute emission reduction targets, and all States should enhance their mitigation measures in the light of their different national circumstances in a manner that protects children’s rights to the maximum possible extent;”*¹⁰

A failure to meet these targets represents a breach of children’s rights and their enjoyment of a clean, healthy and sustainable environment and we are seeking clarification on the contingency mechanism that will be put in place by DAERA to progress in meeting these targets if we continue to have no government in Northern Ireland. We cannot afford ‘net zero’ to become like the ‘diet we are never going to go on’ creating disillusionment and apathy and missing out on the opportunity to transform our economy.

Recommendation 1: NICCY calls for a contingency mechanism to be put in place to progress meeting the legal targets as set out in the NI Climate Change Act in the ongoing absence of an Executive.

We note that the CCC’s Stretch Ambition Pathway for Northern Ireland (which still only gets us to 93% reduction in emissions by 2050) refers to the need for carbon capture technology and storage (CCS). Much of the evidence would show that CCS fails so frequently because it is expensive to build, the technology is unreliable and there is no real profit to be earned unless you use the CO₂ to enable greater extraction of underground oil

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tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGC%2F26&Lang=en
p.17

and gas wells. 11

“98 (e) Mitigation measures cannot rely on removing greenhouse gases from the atmosphere in the future through unproven technologies. States should prioritize rapid and effective emissions reductions now in order to support children’s full enjoyment of their rights in the shortest possible period of time and to avoid irreversible damage to nature.”¹²

Many people don’t understand CCS and that’s a real challenge as there are many political and economic forces pushing for various forms of carbon capture which muddy the waters. Ultimately, we should be aiming for world that minimises CCS with true decarbonisation doing most of the work. We cannot use CCS as a crutch diverting resources away from decarbonisation to create an infrastructure that manages our waste.

3.Towards a Climate Action Plan – Climate Change Committee Advice

“Mitigation aligned with 1.5-2 degrees of warming is an issue of major structural change. It means improving the fabric of our homes, rapidly expanding public transport, developing a massive programme of electrification, changing town planning, rolling out e-bikes in cities and share electric vehicles in rural environments. All this could be a win-win for the majority within our nations. Our cities and urban environments could again be built around people rather than two-tonne metal boxes. High quality, secure jobs would emerge. Children would be safe to cycle, and the air would be better for their lungs.”¹³

We are disappointed that we are not yet at the stage of having a Climate Action Plan in Northern Ireland. Unless we get a credible and citizen informed and developed plan in the near future net zero will remain merely aspirational.

The development of Northern Ireland’s first Climate Action Plan needs to be grounded in the opportunities that a Net Zero wellbeing economy can bring to the region and in

¹¹ The Climate Book (2022), p.263

¹² [General comment No. 26 \(2023\) on children’s rights and the environment with a special focus on climate change | OHCHR](#)

¹³ The Climate Book (2022), p.209

particular children and young people.¹⁴ It can help transform, for example, our housing stock, transport systems, job market, and food systems; Northern Ireland could grow an economy that serves people and the planet's wellbeing. The language in this consultation document and previous documents does not inspire or paint a picture of what might be possible as a result of this transition. The government needs to inspire people and communities shifting the net zero story from just technicalities and data to "an aspirational project for society, with deep cultural resonance."¹⁵

*"This is too important to get wrong. Delivering net zero is the industrial revolution of our time – and climate change the greatest threat. Not only can the transition deliver a thriving, modern, green economy but it can materially improve people's lives. Supporting nature must be an essential part of the UK's response. A thriving natural environment is inextricably linked with protecting our climate and growing our economy."*¹⁶

We will now comment on elements of the CCC advice framed by a number of the recommendations in the Child's Version of General Comment 26 informed by key articles in the UN Convention for the Rights of the Child.¹⁷

Article 2 Right to non-discrimination 'We're not all in the same boat'.

"Environmental harm can be a bigger threat for certain groups of children, especially Indigenous children, children of minority groups, children with disabilities and children living in places more affected by disasters and climate change."

In our latest Statement on Children's Rights in Northern Ireland, we recommended that the government commit to a 'just transition' approach to climate action, to promote equality between generations, geographies and socioeconomic groups and to ensure that the cost of climate actions does not impact already disadvantaged groups.¹⁸ We have also recommended the development of Child Rights Impact Assessment (CRIA) ensuring that the needs and rights of different groups of children are recognized and responded to.

¹⁴ [MISSION ZERO - Independent Review of Net Zero \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

¹⁵ New European Bauhaus

¹⁶ [MISSION ZERO - Independent Review of Net Zero \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) p.8

¹⁷ [Child Friendly Version - English \(ohchr.org\)](https://ohchr.org)

¹⁸ [NICCY-SOCRNI-3-Main-Report-2022-final-web.pdf](#) p.115

*“CRIAs should be carried out in the development of policy, legislation, practice, budgets, services and planning decisions directly or indirectly affecting a child or group of children. As outlined above, CRIAs should be conducted as early as possible in the development process, prior to finalizing proposals, rather than subsequent to the development of proposed legislation, policies, etc. Ideally, CRIAs should be carried out on measures as they are developed and integrated into the development process.”*¹⁹

A key group of children and young people in Northern Ireland who will be increasingly impacted by climate breakdown are children and young people within the refugee and asylum-seeking system.

*“As the planet continues to heat in the coming decades, extreme events will become more frequent and severe, particularly across the tropics, where people’s homes, agriculture and infrastructure are threatened,”*²⁰

And yet some of the complex causes of this climate migration as well as responsibilities do not often form part of politicians’ speeches. For example: the historical emissions of the United Kingdom still up in the atmosphere; the cutting of the overseas aid budget by 16.4% to fund the UK’s asylum system; the reliance on short term populist soundbites as opposed to long term vision and action. As UNICEF reported this week,²¹ at least 43 million child displacements were linked to extreme weather events over the past six years, the equivalent of 20,000 children being forced to abandon their homes and school every single day.

*“Climate is the fastest-growing driver of child displacement yet most policies and discussions about climate finance fail to consider or prioritize children.”*²²

Recommendation 2: NICCY calls for a Child Rights Impact Assessment (CRIA) is undertaken as early as possible by DAERA in the development of the Climate Action Plan to understand and resolve how groups of children might be directly or

¹⁹ [Child Rights Impact Assessment \(CRIA\) - Niccy](#)

²⁰ [A hotter world forcing people on the move needs vision, not Suella Braverman’s rabble-raising words | Gaia Vince | The Guardian](#)

²¹ [Climate displacement report \(English\).pdf \(unicef.org\)](#)

²² [Climate displacement report \(English\).pdf \(unicef.org\)](#)

indirectly impacted, paying special attention to how children of all ages and backgrounds might be impacted differently. The CRIA should link into an Equality Impact Assessment (EQIA) and Rural Needs Impact Assessment.

Articles 3 & 6 Best interests of the child and the right to life, survival and development

“When making decisions about the environment and climate change, governments must consider how children will be impacted and how they will support the wellbeing and development of children growing up today and in the future.”

There are numerous key pieces of legislation, policies and programmes of work which are currently shaping Northern Ireland’s response to climate change, biodiversity loss, pollution and a just transition. Whilst there is a passing mention to rights, in places, it would be fair to say that a child’s rights perspective to live, grow up and develop in healthy, safe environments is rarely referenced. This is even though children and young people in Northern Ireland, as in many places across the globe, have been at the forefront of articulating “the urgent need to address the adverse effects of environmental harm and climate change” and have demonstrated their capacity as changemakers.

The importance of a just transition in moving to net zero cannot be overemphasized. As we have seen in France, London and Germany, for example, if climate change and net zero policies and targets do not adequately support those families who can least afford to undertake the changes required, we will leave people behind, increase child poverty and in some cases drag climate change into the arena of far-right rhetoric and politics.

Recommendation 3: NICCY calls for the Just Transition Committee as set out in the Climate Change Act must be established as a matter of urgency, tying in with the timeframe for the development of the Climate Action Plan, include membership of young people and take a strong child rights-based approach.

Article 12 Right to be heard

“Children should be taken seriously by adults and have a say on issues related to the environment and climate change. Governments should involve children when making decisions about the environment and climate change, and make sure they give feedback to children about how their view were considered.”

We welcome DAERA’s commitment and efforts in engaging and listening to a diverse

range of young people during this consultation and previous climate change work. We also welcome their commitment to building a long-term participation architecture with children and young people in working towards the systems change required by the principle of net zero. We would also urge DAERA to invest in a broader citizen participation process. People, young and old, should be provided with information, to learn and to be involved.

“The government needs to encourage meaningful and ongoing engagement of children and young people in developing and implementing actions to protect the environment and address climate change; and establish accessible engagement processes and recognise children’s right to information and to protest, challenge and access legal complaints mechanisms. (SOCRNI)²³”

Recommendation 4: NICCY calls for DAERA to co-design with children and young people a participation architecture for the long-term engagement and participation to achieve the systems change required to meet net zero by 2050.

Articles 13, 15 Right to freedom of expression, association and peaceful assembly.

Children and young people have been actively involved in climate protests, with the Fridays for the Future movement as the most well-known. In Northern Ireland, respondents to a recent piece of research noted that some schools supported children to attend including providing transport and accompanying them on protests while others did not permit children to join.²⁴

“The right to peaceful assembly is particularly important for children as they often lack political power and are not represented in traditional structures. Gathering with others in person or online for a common purpose provides an important way in which children can come together to be heard. As with the right to freedom of association, States should take positive steps to ensure that all children can enjoy the right safely.”²⁵

Recommendation 5: NICCY calls for DAERA to ensure that in any guidance and information provided to schools with regards learning about and responding to climate change the ‘right to peaceful association and assembly’ is protected.

²³ [NICCY-SOCRNI-3-Main-Report-2022-final-web.pdf](#) p.219

²⁴ [2022-Synthesis-Report-Climate-Justice.pdf \(enoc.eu\)](#)

²⁵ [2022-Synthesis-Report-Climate-Justice.pdf \(enoc.eu\)](#), p.30

Articles 13, 17 Access to information

“Governments should make sure that children have access to clear, accurate environmental and climate-related information, including information about plans and decisions being made, and about actions that children can take themselves. Information should be shared in different ways so that children of different ages and backgrounds can understand it.”

In our response to the department’s consultation on Climate Change Reporting we noted that designated public bodies effectively reporting on climate change adaptation and mitigation measures is a core part of the architecture being set up to meet Northern Ireland’s obligations under the Climate Change Act (Northern Ireland) 2022. Whilst we could not comment on the mechanics of the reporting process, we emphasised that the information produced must be collated and made accessible to children and young people.

Public involvement and in particular the involvement of children and young people across this architecture is a matter of legitimacy and mandate of the Climate Change Act.

Clear communication, including greater transparency and clarity on what public bodies are doing and where they are struggling, and the presentation of materials alongside sufficiently resourced communication channels will facilitate much richer public engagement and involvement. Ultimately compelling narratives that excite and inspire is what will lead to the transformational changes required.

Recommendation 6: NICCY calls children and young people to be involved in co-designing a reporting process that provides them with the information they require to provide input and to hold duty bearers accountable to meet the legislative targets.

General Comment 26 offers the following recommendation to governments:

34. States have an obligation to make environmental information available. Dissemination methods should be appropriate to children’s ages and capacities and aimed at overcoming obstacles, such as illiteracy, disability, language barriers, distance and limited access to information and communications technology. States should encourage the media to disseminate accurate information and materials

*regarding the environment, for example, measures that children and their families can take to manage risks in the context of climate change-related disasters.*²⁶

Recommendation 7: NICCY calls for DAERA to invest in ‘child friendly’ versions of key documents produced in relation to climate breakdown, pollution and biodiversity loss and what children and young people can do.

Articles 24, 26, 27 Right to health, social security and decent standard of living

“Children’s physical and mental health should not be affected by climate change, pollution, unhealthy ecosystems and loss of biodiversity. If a child experiences health issues, they must be able to access healthcare and support.”

“Children should be able to access safe food, clean water, decent housing and materials needed for them to live and grow. Governments need to make sure children are not living in poverty or unsafe conditions.”

In relation to these Articles, we are focusing specifically on the top three emitting sectors in Northern Ireland i.e. the agricultural, transport and residential sectors.

In a report published by the Consumer Council in 2022, it refers to the latest estimates that 18% of households in Northern Ireland are living in fuel poverty. In a survey of energy consumers as part of this research, the report stated that:

“34% of households are classified as being in fuel poverty (note that this estimate is based on the proportion of households spending more than 10% of net annual household income on energy) [also please note that 34% of all households equates to approximately 247,000 households in N Ireland].”²⁷

The report also noted that parents in fuel poverty often prioritise keeping the home warm for the sake of their children with rationing of heating tending to fit around times of the day that children were out of the house. According to General Comment 26:

“48. Children, including displaced children, should have access to adequate

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tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGC%2F26&Lang=en

²⁷ [2 \(consumerCouncil.org.uk\)](https://www.consumerCouncil.org.uk)

housing that conforms to international human rights standards. Housing should be sustainable and resilient and should not be built on polluted sites or in areas facing a high risk of environmental degradation. Homes should have safe and sustainable sources of energy for cooking, heating, lighting and appropriate ventilation and be free from mould, toxic substances and smoke. There should be effective management of waste and litter, protection from traffic, excessive noise and overcrowding and access to safe drinking water and sustainable sanitation and hygiene facilities.”²⁸

Recommendation 8: NICCY calls for the Climate Action Plan to prioritise tackling fuel poverty and children’s right to decent housing through introducing policies with adequate budget and resources to incentivise homeowners and developers to install zero-carbon heating appliances, develop community owned energy schemes which tap into the potential of renewable energy, replace oil boilers with heat pumps and deliver energy efficient improvements in homes targeted at low-income households.

We know that livestock is the main source of Northern Ireland’s agricultural emissions, and that agriculture makes up 27% all overall emissions. Transforming how we grow and produce and consume our food is at the forefront of tackling climate change, pollution and biodiversity loss as well as improving children and young people’s wellbeing. A quarter of children in Northern Ireland aged 2-15 years are reported to be overweight (20%) or obese (6%)²⁹ and one in six people across Northern Ireland has faced hunger in the last year according to a report by the Trussell Trust with one third of those households including a child under 16.³⁰

Recommendation 9: NICCY calls for a new farm support policy in Northern Ireland aligned with the Climate Action Plan and the target of Net Zero with payments linked to agricultural emissions reductions, afforestation and other sequestration measures. These measures need combined with adjusting our diets towards an overall healthy and equitable animal protein intake and reducing food waste with a reduction of meat, dairy and egg consumption in line with health guidelines and

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tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRC%2FC%2FGC%2F26&Lang=en

²⁹ [Northern Ireland and policies combatting obesity | safefood](#)

³⁰ [Landmark research reveals ‘devastating’ extent of food poverty in Northern Ireland | BelfastTelegraph.co.uk](#)

children's right to healthy and sustainable food.

Transport continues to be a key priority for young people with issues such as rural transport; prices of fares; the lack of safe affordable alternatives such as adequate cycle lanes; the railway infrastructure and lack of linkage to our airports; restrictions with bus passes for supporting extracurricular activity, volunteering and for those who require a bus to school but don't meet the criterion. Whilst the focus on changing our transport system remains on the rapid deployment of electric vehicles there are serious concerns with regards whether there will be the same level of investment in charging bays in rural areas and whether we will see a repeat of the failure to ensure equitable access to broadband. In addition, changing our transport system is not just about 'mode shifting' but also 'destination' system and reducing the need for journeys which requires the alignment with regional planning policies.

Through conversations with some young people in rural areas another important issue arose: the rite of passage when a young person can get their own car. Anecdotal evidence seems to indicate that the rate of car ownership for 17-year-olds has been increasing with schools and colleges struggling to cater for the increasing numbers of cars: young people who previously would have been coming in on public transport. As with all issues, this is a complex mix of culture and the lack of available and affordable transport system for leisure, sporting and social activities for young people in rural areas.

Recommendation 10: NICCY calls for the Climate Action Plan to prioritise Active Travel school schemes and free public transport for all children and young people including children and young people within the asylum and refugee system.

Articles 28, 29 Right to education

"Children should be given environmental education that is accurate and in ways that they understand. Environmental education should support children to connect with, and respect, the environment, The places where children learn should be safe from environmental harm."

A rights-based environmental education should be transformative, inclusive, child-centred, child-friendly and empowering. It should pursue the development of the child's personality, talents and abilities, acknowledge the close interrelationship between respect for the natural environment and other ethical values enshrined in article 29 (1) of the Convention

and have both a local and global orientation.³¹ The campaign by the Students Organising for Sustainability (SOS) on Teach the Future provides a very useful model.³²

“53. School curricula should be tailored to children’s specific environmental, social, economic and cultural contexts and promote understanding of the contexts of other children affected by environmental degradation. Teaching materials should provide scientifically accurate, up-to-date and developmentally and age-appropriate environmental information. All children should be equipped with the skills necessary to face expected environmental challenges in life, such as disaster risks and environment-related health impacts, including the ability to critically reflect upon such challenges, solve problems, make well-balanced decisions and assume environmental responsibility, such as through sustainable lifestyles and consumption, in accordance with their evolving capacities.”³³

Recommendation 11: NICCY calls for DAERA and the Department of Education to ensure that learning about climate change, pollution and biodiversity loss is a key priority in the NI Curriculum following the recommendations of General Comment 26.

Article 31 Right to rest and play

“Children should be able to play and be active in clean, safe places and connect with our natural world. Governments need to consider where and how children can play and rest when they make plans for new neighbourhoods or places where children may visit.”

Equitable access to ‘green spaces’ is a key factor in ensuring the right to rest and play. In March 2022, only 43 per cent of households in Northern Ireland had accessible natural space within 400 metres³⁴. Access to and participation in outdoor recreation is not equal across society and is particularly true for people who are unemployed, people with

³¹ [General comment No. 26 \(2023\) on children’s rights and the environment with a special focus on climate change | OHCHR](#)

³² [Teach the Future | SOS-UK](#)

³³ [General comment No. 26 \(2023\) on children’s rights and the environment with a special focus on climate change | OHCHR](#)

³⁴ [Northern Ireland Environmental Statistics Report 2022 | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](#)

disabilities and rural residents.

Recommendation 12: NICCY calls for children and young people’s right to rest and play in the natural world is considered a priority within the Climate Action Plan.

Three further aspects are considered within the Child-Friendly version of General Comment 26 of relevance to this response.

Access to justice

“Make sure children are supported to access justice – that is, solutions, support and compensation for the harm and consequences they are experiencing – at national, regional and international levels.”

Recommendation 13: NICCY calls for the Climate Action Plan to provide access to justice pathways for children, including complaints mechanisms that are child-friendly, gender-responsive and disability-inclusive, to ensure their engagement with effective judicial, quasi-judicial and non-judicial mechanisms, including child-centred national human rights institutions, in respect of violations of their rights relating to environmental harm. This includes removing barriers for children to initiate proceedings themselves, adjusting the rules of standing and empowering national human rights institutions with mandates to receive complaints from children. ³⁵

Business

“Make sure that businesses also respect children’s rights by creating laws, regulations and policies to prevent companies from polluting the environment and harming children, and to make businesses do not hide their environmental impact.”

In our response to the Circular Economy Strategy by the Department of the Economy NICCY called for strong regulation to ensure that businesses are held to the highest employment, health and environmental standards when rolling out circular economy practices. We also called for government to invest in and grow existing circular economy expertise and innovation in civic society. The creation of high value jobs is also critical, informed by the principles of a just transition with investment in education and learning.

³⁵ [General comment No. 26 \(2023\) on children’s rights and the environment with a special focus on climate change | OHCHR](#) p.83

We also strongly believe that the 'people dimension' of moving to a circular economy is vital. This means investing in creative public information campaigns, messaging, and education. Finally, all funding and investment should be underpinned by the principles of a just transition and contribute to a reduction in poverty and inequalities.

Recommendation 14: NICCY calls for the Climate Action Plan to provide a framework ensuring that businesses respect children's rights through effective, child-sensitive legislation, regulation, enforcement and policies and remedial, monitoring, coordination, collaboration and awareness-raising measures. The Northern Ireland Executive should require businesses to undertake child rights impact assessments, due diligence procedures to identify, prevent, mitigate and account for their impact on the environment and children's rights. Immediate steps should be taken in the event that children are identified as victims to prevent further harm to their health and development and to adequately and effectively repair the damage done in a timely and effective manner. ³⁶

Cooperate 'Internationally'

"Cooperate internationally with other governments as environmental problems do not stop a country's border."

It would have been useful to see some analysis of the potential cross border impacts, issues, alignments and potential contradictions. It is important that policy and practice in the journey to net zero are aligned as far as possible in both jurisdictions. NICCY has previously referenced the need for better alignment post-Brexit to protect children and young people's rights. ³⁷

Recommendation 15: NICCY calls for the Climate Action Plan to align with the Republic of Ireland's Climate Action Plan with consideration given to cross border and global developments and analysis.

4. Conclusion

The Child-Friendly Version of General Comment 26 concludes with governments' obligations to:

³⁶ [General comment No. 26 \(2023\) on children's rights and the environment with a special focus on climate change | OHCHR](#) p.14

³⁷ [UK Withdrawal from the EU 'Brexit' - An overview of the potential impact on Children in Northern Ireland - Niccy](#)

“Respect, protect and fulfil children’s rights by taking bold, concrete steps and keeping their promises to make sure every child grows up in a clean, healthy and sustainable environment.”³⁸

The latest CCC advice is unequivocal:

“A step change in decarbonisation action must begin immediately in Northern Ireland and the pace must greatly exceed what has been delivered to date. Northern Ireland must reduce emissions by around 35% within the next decade, compared to an average of 9% per decade since 1990. The CCC’s report sets out how best Northern Ireland can achieve its emissions reduction targets. The CCC advice is modelled based on a series of pathways. This includes an updated Balanced Pathway, supplemented with a ‘Stretch Ambition’ scenario and two ‘Speculative’ options. The CCC recognises delivering these will be highly challenging for Northern Ireland.”³⁹

So far, we have failed to see bold and concrete steps by our government. The solutions to climate breakdown and environmental degradation are dependent on our willingness to change our behaviours, our laws and relationships with the rest of the natural world.

Work is ongoing by civil servants to prepare for the return of the NI Executive through developing a draft Programme for Government with next year’s budget projected to be even harsher than that imposed this year.

An incoming Executive may wish to consider aligning its budget with the carbon budget. This would help prioritise investments and ensures that Northern Ireland’s money is being spent in accordance with its net zero commitments “counting carbon dioxide the same way as we count money”⁴⁰ Children and young people are bearing the brunt of the budget cuts with many critical services being reduced or withdrawn.

NICCY recommends that the Executive, led by the Minister for Children, works together to build a Budget for Children’s Wellbeing that is rights based, preventative and participatory, aligned with the Children’s Services Co-operation (Northern Ireland) Act 2015, the

³⁸ [Child Friendly Version - English \(childrightsenvironment.org\)](https://childfriendlyversion.org/)

³⁹ [Advice report: The path to a Net Zero Northern Ireland - Climate Change Committee \(theccc.org.uk\)](https://theccc.org.uk/)

⁴⁰ [Microsoft Word - Carbon City budget briefing LayoutRC.docx \(energy-cities.eu\)](https://energy-cities.eu/)

Children and Young People Strategy (2020-2030), Carbon Budgets and the Climate Action Plan.

Recommendation 16: NICCY calls for the NI Executive to work towards a Budget for Children’s Wellbeing aligned with aligned with the Children’s Services Co-operation (Northern Ireland) Act 2015, the Children and Young People Strategy (2020-2030), Carbon Budgets and the Climate Action Plan.

“Many things about climate change are unfair. One of them is the way it is stealing a healthy, clean planet from young people.”⁴¹

Summary of Recommendations

Recommendation 1: NICCY calls for a contingency mechanism to be put in place to progress meeting the legal targets as set out in the NI Climate Change Act in the ongoing absence of an Executive.

Recommendation 2: NICCY calls for a Child Rights Impact Assessment (CRIA) is undertaken as early as possible by DAERA in the development of the Climate Action Plan to understand and resolve how groups of children might be directly or indirectly impacted, paying special attention to how children of all ages and backgrounds might be impacted differently. The CRIA should link into an Equality Impact Assessment (EQIA) and Rural Needs Impact Assessment.

Recommendation 3: NICCY calls for the Just Transition Committee as set out in the Climate Change Act must be established as a matter of urgency, tying in with the timeframe for the development of the Climate Action Plan, include membership of young people and take a strong child rights-based approach.

Recommendation 4: NICCY calls for DAERA to co-design with children and young people a participation architecture for the long-term engagement and participation to achieve the systems change required to meet net zero by 2050.

Recommendation 5: NICCY calls for DAERA to ensure that in any guidance and information provided to schools with regards learning about and responding to

⁴¹ Klein, N., How to Change Everything – the Young Human’s Guide to Protecting the Planet and Each Other, (2022), p.6

climate change the 'right to peaceful association and assembly' is protected.

Recommendation 6: NICCY calls children and young people to be involved in co-designing a reporting process that provides them with the information they require to provide input and to hold duty bearers accountable to meet the legislative targets.

Recommendation 7: NICCY calls for DAERA to invest in 'child friendly' versions of key documents produced in relation to climate breakdown, pollution and biodiversity loss and what children and young people can do.

Recommendation 8: NICCY calls for the Climate Action Plan to prioritise tackling fuel poverty and children's right to decent housing through introducing policies with adequate budget and resources to incentivise homeowners and developers to install zero-carbon heating appliances, develop community owned energy schemes which tap into the potential of renewable energy, replace oil boilers with heat pumps and deliver energy efficient improvements in homes targeted at low-income households.

Recommendation 9: NICCY calls for a new farm support policy in Northern Ireland aligned with the Climate Action Plan and the target of Net Zero with payments linked to agricultural emissions reductions, afforestation and sequestration. These measures need combined with adjusting our diets towards an overall healthy and equitable animal protein intake and reducing food waste with a reduction of meat, dairy and egg consumption in line with health guidelines and children's right to healthy and sustainable food.

Recommendation 10: NICCY calls for the Climate Action Plan to prioritise Active Travel school schemes and free public transport for all children and young people including children and young people within the asylum and refugee system.

Recommendation 11: NICCY calls for DAERA and the Department of Education to ensure that learning about climate change, pollution and biodiversity loss is a key priority in the NI Curriculum following the recommendations of General Comment 26.

Recommendation 12: NICCY calls for children and young people’s right to rest and play in the natural world is considered a priority within the Climate Action Plan.

Recommendation 13: NICCY calls for the Climate Action Plan to provide access to justice pathways for children, including complaints mechanisms that are child-friendly, gender-responsive and disability-inclusive, to ensure their engagement with effective judicial, quasi-judicial and non-judicial mechanisms, including child-centred national human rights institutions, in respect of violations of their rights relating to environmental harm. This includes removing barriers for children to initiate proceedings themselves, adjusting the rules of standing and empowering national human rights institutions with mandates to receive complaints from children.

Recommendation 14: NICCY calls for the Climate Action Plan to provide a framework ensuring that businesses respect children’s rights through effective, child-sensitive legislation, regulation, enforcement and policies and remedial, monitoring, coordination, collaboration and awareness-raising measures. The Northern Ireland Executive should require businesses to undertake child rights impact assessments, due diligence procedures to identify, prevent, mitigate and account for their impact on the environment and children’s rights. Immediate steps should be taken in the event that children are identified as victims to prevent further harm to their health and development and to adequately and effectively repair the damage done in a timely and effective manner.

Recommendation 15: NICCY calls for the Climate Action Plan to align with the Republic of Ireland’s Climate Action Plan with consideration given to cross border and global developments and analysis.

Recommendation 16: NICCY calls for the NI Executive to work towards a Budget for Children’s Wellbeing aligned with aligned with the Children’s Services Co-operation (Northern Ireland) Act 2015, the Children and Young People Strategy (2020-2030), Carbon Budgets and the Climate Action Plan.