

Summary of Responses to

Consultation on Northern Ireland's Fourth Carbon Budget (2038-2042)



Department of
**Agriculture, Environment
and Rural Affairs**

An Roinn

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Executive Summary

In March 2022, the Northern Ireland Assembly passed the Climate Change Act (Northern Ireland) 2022¹ (the Act).

The Act sets out the framework for Northern Ireland to address climate change and set legally binding emissions reduction targets, including the achievement of net zero emissions by 2050, with interim targets for 2030 set in the Act of an at least 48% reduction in emissions, and a target for 2040² of an at least 77% reduction in emissions.

The Act requires that the Department of Agriculture, Environment and Rural Affairs (DAERA) set five-yearly carbon budgets, to limit emissions and keep Northern Ireland on a trajectory to meet the net zero 2050 target and interim reduction targets in the Act. In December 2024 the Northern Ireland Assembly affirmed legislation that set the first 3 Carbon Budgets for Northern Ireland (2023-2037) in law. This is in line with the recommendation from the UK Climate Change Committee (CCC).

As required by the Act, the Department again sought the advice of the CCC on the level at which the Fourth Carbon Budget, covering the period 2038 to 2042, should be set. The CCC published their advice³ on 19 March 2025 and recommended that it was set at an average annual reduction of 77% against the baseline.

As also required by the Act, a 16-week consultation seeking views on the level at which the Fourth Carbon Budget should be set was launched on 28 July 2025 and closed on 17 November 2025.

The consultation posed four questions designed to provide quantitative (mathematical and statistical) and qualitative (thematic, subject and content) data for analysis which are set out in this summary report.

¹ [Climate Change Act \(Northern Ireland\) 2022](#)

² [The Climate Change \(2040 Emissions Target\) Regulations \(Northern Ireland\) 2024](#)

³ [Northern Ireland's Fourth Carbon Budget - Climate Change Committee](#)

Consultation findings - Summary overview

Responses overview

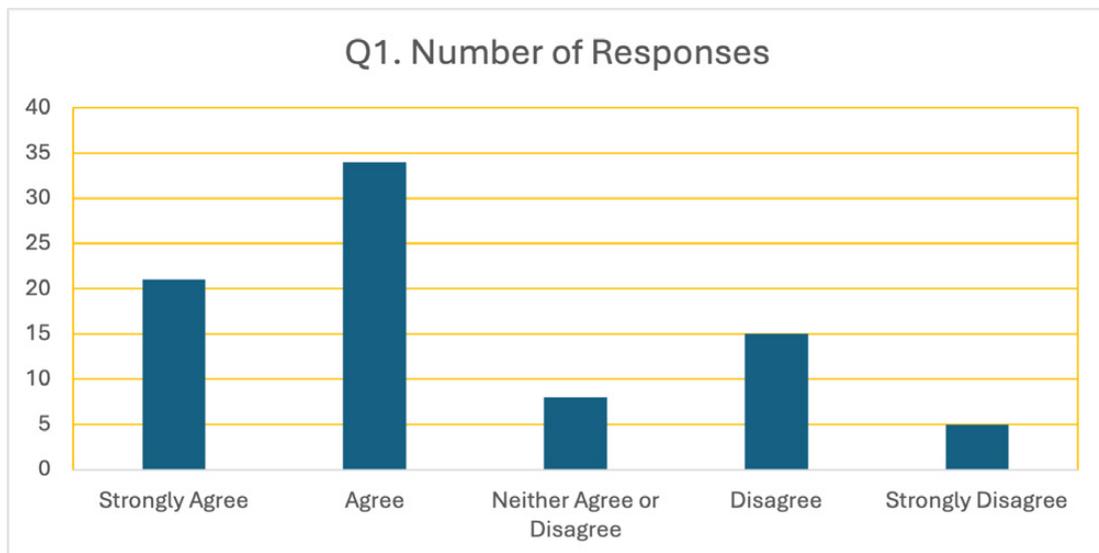
There were 87 responses to the consultation. Respondents had the option to answer all or to select to just answer some of the four questions asked and, if they wished to do so, to provide additional supporting information or comments. There were many helpful comments and further detail provided in the responses, and these are reflected in this summary document.

68% of responses (that is 59 respondents) to the consultation were from an organisation with the remaining 32% individual personal responses (28 responses). As detailed in this document and Figure 1 below the consultation showed strong support for the proposed 77% emissions reduction target.

Overall, 66% of all responses agreed or strongly agreed with the proposal.

Of the 59 responses which were from organisations (which included businesses, public sector organisations such as Councils, NGOs and charities) **80%** indicated that they 'Strongly Agreed' with or 'Agreed' with the proposed level of the carbon budget being set to align to the advice received from the CCC.

Figure 1: Numbers of responses to Q1 against each of the options



Question 1: Trajectory

As noted above from those that responded to this question 66% 'Strongly Agreed' or 'Agreed' to the proposal to align to the CCC advice, with 24% responding that they 'Disagreed' or 'Strongly Disagreed' to the proposal and 10% 'Neither Agreeing nor Disagreeing'.

Respondents also had an opportunity to add narrative to support their response. The main themes that emerged included:

- Alignment with legal requirements and expert advice, as this is seen as essential for achieving net zero by 2050.
- Strong support for following CCC advice.
- Benefits from setting the target for health, wellbeing and the environment including cleaner air, warmer homes, improved health, and stronger communities.
- Economic opportunity and certainty for investment, innovation and long-term planning.
- Importance of delivery mechanisms, the need for robust, clear, actionable policies, cross-departmental coordination, sufficient investment, and clear guidance on sector-specific pathways.
- The need for government intervention, funding and support for skills and infrastructure to ensure targets are achievable.
- Fairness and social justice issues were raised frequently, particularly regarding impacts on rural communities, farmers, young people and vulnerable groups; there were calls for impact assessments and just transition measures for individual policies.

Question 2: Ambition

Respondents were asked what other considerations/factors were important to them in considering the level of the Fourth Carbon Budget. In responding to this question, consultees could select as few or as many of the suggested options provided as they wished, or to include other suggestions.

Table 1 below details the options for Question 2 and the percentage of respondents who considered the individual factors to be important. There were 57 responses to this question.

Table 1: Options and Responses for Question 2	Percentage of responses selecting this option	Total number of responses
Economic opportunities including green jobs	89.4%	51
Equity among sectors – this means ensuring that all sectors of our economy play their part and none are left behind	87.7%	50
Fairness for citizens – including our children and young people and across regions and communities	87.7%	50
Taking account of scientific advice and the particular circumstances of Northern Ireland	80.7%	46
Fairness to future generations	80.7%	46
Environmental and public health benefits	78.9%	45
Innovation and Technological readiness	75.4%	43
Maintaining alignment with UK, Ireland, and global emissions reduction targets	61.4%	35
Other	49.1%	28

Under the option of ‘Other’, there were a wide range of suggestions, however recurring themes highlighted by respondents included ensuring social fairness and a just transition, financial considerations including investment certainty, food security, nature recovery and environmental protection, the importance of communities and local initiatives and long-term sustainability for future generations and increased resilience.

Question 3: Impacts

Question 3 sought views on the potential impacts (positive and negative) that will be realised by Northern Ireland reducing its emissions to meet the proposed Fourth Carbon Budget level as recommended by the CCC. Six example themes were provided to guide respondents. These align with the Impact Assessments which are required to be undertaken for policy decisions including the impacts and benefits in terms of financial, economic, social, rural, equality and the impacts on children and young people.

Some key themes which emerged in response to this question included:

- **Financial Impacts:** There were some concerns about the potential for high upfront costs for households, increased bills, and impact on public sector budgets however there were equally comments on avoided costs of inaction, recognition of significant business opportunities and economic growth and investment potential.
- **Economic Impacts:** Responses commented on the potential for green job creation, investment and building resilience. Some respondents had concerns about possible job disruption in traditional industries.
- **Social Impacts:** Recognition of improved public health, wellbeing, and improved housing, however, some responses cautioned that poorly designed policies could increase inequality and fuel poverty if not managed fairly.
- **Rural Impacts:** Some responses were concerned that rural communities could face heightened challenges with a reliance on oil heating/rural transport but would benefit from renewable energy and sustainable land management with appropriate support.
- **Equality and Fairness:** The need for a “just transition” was emphasised by respondents with suggestions for targeted support for low-income and rural groups. There was strong support for the principle of just transition and intergenerational fairness which are embedded within the Climate Change (Northern Ireland) Act 2022.
- **Impact on Children and Young People:** Safeguarding future generations with a safer climate, healthier environment, and green career opportunities was highlighted in many of the responses.
- **Environmental and Climate Benefits:** Respondents stated that emission reductions should be recognised for their positive effects on biodiversity, ecosystem health, and broader environmental outcomes.
- **Infrastructure and Technological Challenges:** Some concerns exist about the adequacy of current infrastructure and challenges in adopting new technologies, especially in rural or disadvantaged areas.
- **Support Mechanisms:** There was support for government intervention in the form of funding, training, and community engagement to ensure a fair and effective transition.

Question 4: Additional Information

Question 4 provided respondents with the opportunity to add any other information they felt was relevant and had not had the opportunity to raise earlier in the consultation.

In total 60 consultees chose to respond to this section. Recurring themes in the responses to this question included:

- Cross-departmental and sectoral working as well as flexible policy making;
- Agriculture's role and challenges including the significant role of agriculture in land use solutions;
- Just transition and rural support;
- Science, metrics, and policy design;
- Technological innovation and nature-based solutions, biodiversity benefits;
- Need for public engagement and education;
- The importance of governance;
- Infrastructure, funding, and delivery including the need for long-term ringfenced investment; and
- Fairness, equity, and positive socio-economic impacts.
- Many responses underscored the importance of sustained public engagement, education, and transparent communication to build understanding and to develop and support climate policy implementation.

The Department would like to express our thanks to everyone who responded to the consultation.

Background

The background of the page is a solid dark teal color. It features several large, overlapping, curved shapes in lighter shades of teal and light blue, creating a layered, organic effect. The shapes are positioned in the upper right, lower left, and bottom right areas, leaving the central-left portion clear for the text.

Background

Climate Change Act (Northern Ireland) 2022

The Climate Change Act (Northern Ireland) 2022 (the Act), requires that the Department of Agriculture, Environment and Rural Affairs (DAERA) set five-yearly carbon budgets, to limit emissions and keep Northern Ireland on a gradual and managed trajectory to meet the targets in the Act.

Carbon Budgets

A carbon budget places a restriction on the total amount of greenhouse gases that can be emitted over a five-year period. The primary purpose of a carbon budget is to ensure that Northern Ireland remains on trajectory to achieve our 2030, 2040 and 2050 emissions reduction targets.

In December 2024, the Northern Ireland Assembly approved 'The Climate Change (Carbon Budgets 2023-2037) Regulations (Northern Ireland) 2024'⁴ which set the first three carbon budgets for Northern Ireland. They are:

- **Carbon Budget 1:** The carbon budget for the 2023-2027 budgetary period is an annual average of 33% lower than the baseline.
- **Carbon Budget 2:** The carbon budget for the 2028-2032 budgetary period is an annual average of 48% lower than the baseline.
- **Carbon Budget 3:** The carbon budget for the 2033-2037 budgetary period is an annual average of 62% lower than the baseline.

In line with the requirements of sections 56 and 58 of the Act, DAERA sought and obtained the expert advice of the UK Climate Change Committee (CCC) on the level at which Northern Ireland's Fourth Carbon Budget should be set. On 19 March 2025, the CCC published their advice report "Northern Ireland's Fourth Carbon Budget"⁵. In their advice report the CCC recommended that the Fourth Carbon Budget is set at an average annual reduction of 77% in emissions across the 2038-2042 period (against the baseline).

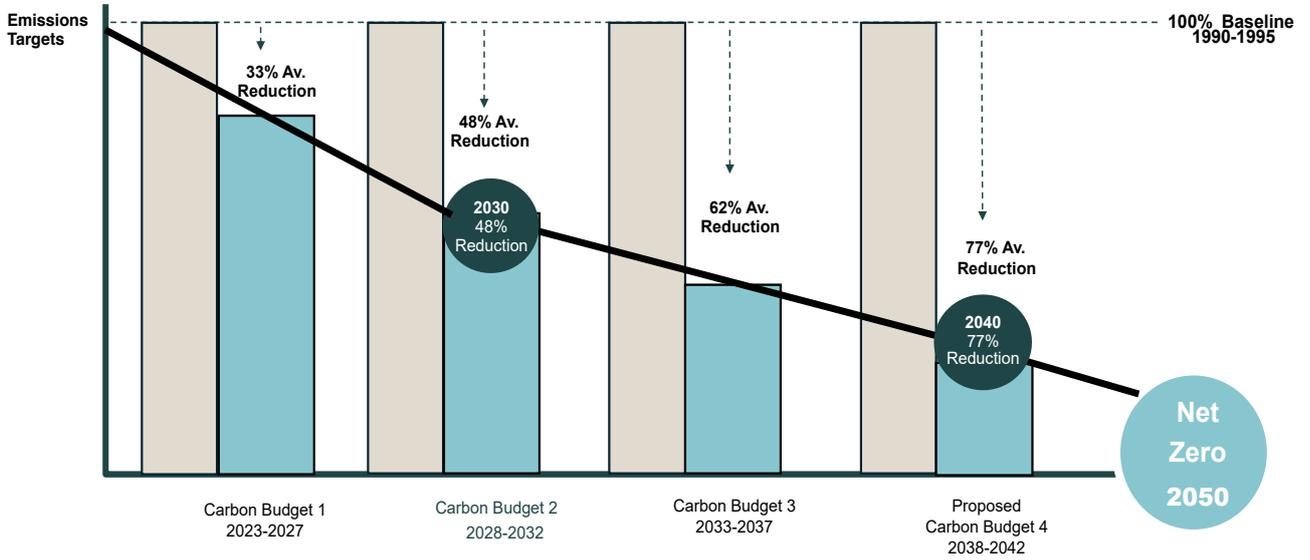
In that report, the CCC set out "The Northern Ireland Net Zero Pathway", which provides an illustrative pathway and recommendations on how the carbon budget can be delivered and met. The CCC, however, acknowledged and advised that it will be up to the NI Executive to determine and decide upon the specific policies, and proposals that will be taken forward to deliver on the emissions reductions required.

Details of the policies and proposals to be progressed will be set out in a Climate Action Plan aligned with the Fourth Carbon Budget, which will be consulted on and presented to the NI Assembly in advance of that budgetary period commencing.

⁴ [The Climate Change \(Carbon Budgets 2023-2037\) Regulations \(Northern Ireland\) 2024](#)

⁵ [Northern Ireland's Fourth Carbon Budget - Climate Change Committee](#)

The Journey- Budgets & Targets



The Consultation

The Consultation

Consultation

In line with the legislative requirement set out in section 23 of the Act, a 16-week public consultation seeking views on the level at which the Fourth Carbon Budget⁶ should be set was launched by the Department on 28 July 2025 and closed on 17 November 2025.

The consultation sought the views of the public on whether the Department should follow the recommendation of the UK Climate Change Committee.

In total 87 responses were received to the consultation of which 67 responses were submitted via the Citizen Space platform and 20 responses were received via email.

Of the 87 responses received, 59 of the respondents indicated that they were representing an organisation (including public bodies such as Councils, private companies, eNGOs and interest groups) and 28 indicated that they were an individual's personal response.

It should be noted that the quotes or views expressed in this summary report are those of the respondents to the consultation exercise and are not necessarily shared or agreed with by DAERA or any other Northern Ireland department.

Methodology

The consultation document, as well as providing background information on the legislative requirements and the proposed Fourth Carbon Budget, posed four separate questions. Respondents had the opportunity to respond to all questions asked or opt to only respond to those questions they wished to do so as well as having the opportunity to provide additional supporting information. This provided data that could be analysed both from a quantitative (mathematical and statistical) perspective, and from a qualitative (thematic, subject and content) perspective which has been used by the Department in this analysis.

Analysis of Consultation Responses

This summarises the quantitative and qualitative responses to the questions posed in the Consultation document.

Quantitative analysis

Questions 1 and 2 provided an opportunity to produce quantitative analysis to an answer to the question.

⁶ [Consultation on the setting of Northern Ireland's Fourth Carbon Budget \(2038-2042\) - NI Direct - Citizen Space](#)

Qualitative analysis

Each question additionally offered the respondent the opportunity to provide more information to any question.

Varying numbers of respondents across each question offered additional commentary and views.

There was significant variation in the level of detail, length and style of the additional supporting information received. All responses were fully considered and included in the analysis.

Summary of Analysis

Summary of analysis

Question 1: Summary of quantitative analysis

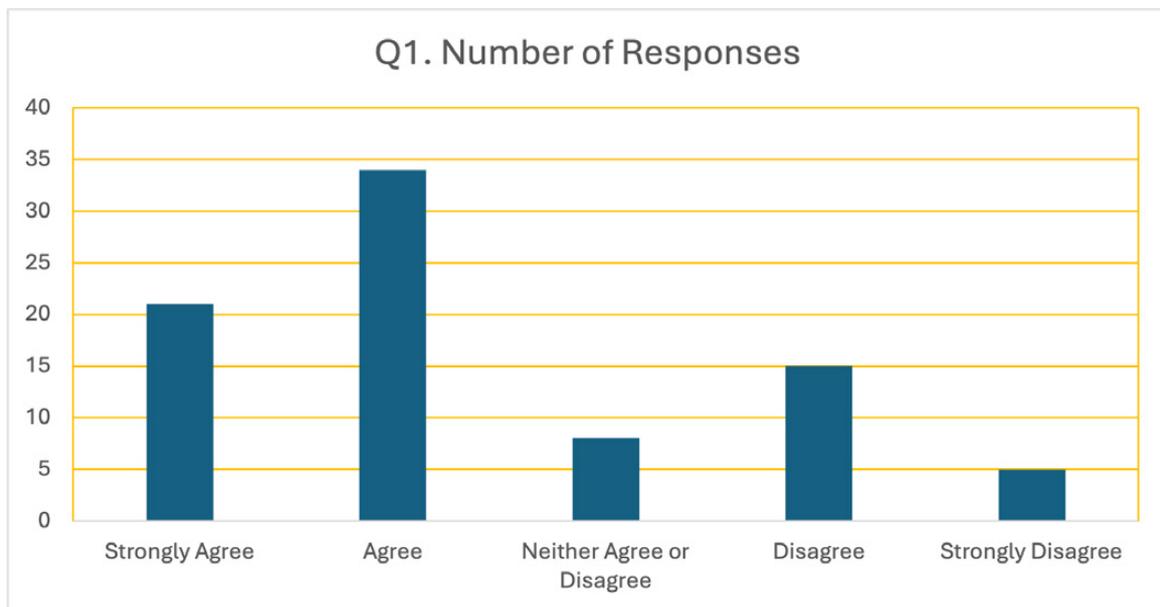
DAERA proposes to set the Fourth Carbon Budget at an average annual reduction of 77%, in line with the advice received from the UK Climate Change Committee (CCC).

Question 1. Do you feel this would provide the necessary trajectory to reduce Northern Ireland emissions and meet the legislative requirements?

Of the 87 responses received there were 83 responses to this first question which are shown in Figure 2. Four respondents chose to not answer this question and therefore are not counted in the percentage figures provided below.

Overall, from the 83 responses received to this question 66% 'Strongly Agreed' or 'Agreed' to the proposal to align to the CCC advice, with 24% responding that they 'Disagreed' or 'Strongly Disagreed' to the proposal and the remaining 10% 'Neither Agreeing nor Disagreeing'.

Figure 2: Numbers of responses to Q1 against each of the options



In analysing, in more detail, across all responses received to this question 55 respondents either 'Strongly Agreed' (25.3%) or 'Agreed' (40.9%) to Question 1.

This resulted in a combined response of **over 66%** 'Strongly Agreeing or Agreeing' to the DAERA proposal of setting the Fourth Carbon Budget at an average annual reduction of 77%.

15 respondents Disagreed (**18.0%**) and only **5** Strongly Disagreed (**6.0%**) to the DAERA proposal.

This resulted in a combined **20** responses or **24.0%** 'Disagreeing or Strongly Disagreeing' to the DAERA proposal in Question 1.

8 respondents (**10%**) 'Neither Agreed nor Disagreed' to the DAERA proposal in Question 1.

Organisation v Personal responses to Question 1

Of the 87 responses received, 59 responses were from organisations which included businesses, public sector organisations such as Councils, eNGOs and charities. The support for this question was much higher among organisations with 80% indicating that they 'Agreed' with or 'Strongly agreed' with the proposed level of the carbon budget being set to align to the advice received from the CCC.

The 28 responses received from individuals was split with 8 'Agreeing or 'Strongly agreeing', 16 'Disagreeing or 'Strongly disagreeing' and 4 'Neither agreeing nor disagreeing' with the proposal to align to the CCC advice.

Question 1: Summary of qualitative analysis

Respondents also had an opportunity to add narrative to support their response, the main themes to emerge included:

- Benefits from setting the target for health, wellbeing and the environment including cleaner air, warmer homes, improved health, and stronger communities.
- Economic opportunity and certainty for investment, innovation and long-term planning.
- Importance of delivery mechanisms, the need for robust clear, actionable policies, cross-departmental coordination, sufficient investment, and clear guidance on sector-specific pathways.
- The need for government intervention, funding and support for skills and infrastructure to ensure targets are achievable.
- Fairness and social justice issues were raised, particularly regarding impacts on rural communities, farmers, and vulnerable groups; calls for economic impact assessments and just transition measures for individual policies.

Support for the proposed 77% reduction and alignment with legislation

The majority of respondents endorsed the proposed average annual emissions reduction of 77% for the fourth carbon budget, emphasising its consistency with statutory climate goals and the guidance of the CCC, for example:

"The DAERA proposal aligns with the advice from the Climate Change Committee (CCC) and ensures NI remains on a credible pathway to meet its 2040 and 2050 emission reduction targets."

Others highlight that such alignment demonstrates credible ambition and offers a clear pathway towards achieving net zero by 2050. This support is often tied to the belief that setting ambitious, legally binding targets is essential to demonstrate leadership and galvanise action across sectors, ensuring Northern Ireland remains committed to meaningful climate progress. A respondent commented that:

“The proposed budget strikes a balance between ambition and achievability, offering a pathway that can be delivered if matched with robust policy interventions, adequate resourcing, and cross-departmental collaboration.”

Concerns about deliverability, funding, and infrastructure

While the majority of responses supported setting fourth carbon budget to align with the CCC advice, there were comments in relation to the need for support mechanisms to be in place such as funding availability, infrastructure, and policy. Some respondents called for clearer implementation plans, sector-specific pathways, and stronger support for transitioning businesses and communities.

“The target level alone does not guarantee delivery: the trajectory will only be productive if accompanied by clear policy direction, funding mechanisms, and infrastructure support.”

Some responses also highlighted the need for clear, actionable policies supported by funding. Other responses highlighted the need for infrastructure upgrades to support delivery and ongoing government involvement which would require cross-departmental collaboration and joined-up policy combined with long-term investment to aid achievement of climate targets.

“To realise this target, it will be critical that appropriate levels of government funding are committed, both centrally and locally.”

Fairness, Social Justice, and Rural Impacts

Equity concerns featured strongly, with several respondents raising the issue of fairness in the proposed climate trajectory:

“NI must balance ambition in reducing emissions with many other considerations including economic and social considerations and fairness for future generations.”

There was particular concern from a number of respondents about potential disproportionate impacts on rural communities, farmers, and low-income households who may face greater challenges in adapting to new policies. Examples of the potential impact on rural communities were cited such as Northern Ireland's high reliance on oil heating, private transport, and agriculture.

Respondents highlighted the need for comprehensive impact assessments and for the establishment of policies that ensure a just transition, protecting vulnerable groups whilst still achieving the necessary emissions reductions. A respondent commented that:

“It will be essential that the trajectory is underpinned by clear sectoral pathways that ensure fair and proportionate contributions from energy, transport, agriculture, land use, and waste.”

Importance of Health, Wellbeing, and Co-Benefits

Several respondents emphasised that climate action should deliver benefits beyond emissions reductions such as improved public health, wellbeing, and social justice with one respondent stating:

“Meeting the legislative targets alone is not sufficient. Climate action must also deliver co-benefits for health, wellbeing, and equity, ensuring that reductions are achieved in ways that improve lives, not just lower emissions.”

Some respondents highlighted that integrating climate and health policy can maximise co-benefits and support a net zero transition that benefits society. This approach favours comprehensive strategies that go beyond emissions targets to create broader value:

“Encouraging low carbon lifestyles can bring positive and lasting change and provide multiple co-benefits to society such as improved health and wellbeing, creation of sustainable green jobs, and a reduction in NI's reliance on fossil fuels.”

Alternative pathways and sector-specific actions

Several responses called for a varied approach to cutting emissions, emphasising that electrification alone is not enough. There was strong support for consideration of alternative technologies, such as biofuels, hybrid heating, and methane capture.

Some respondents also highlighted the importance of coordinating policies across land use, forestry, waste, and transport. Concerns mentioned included staff shortages, aging infrastructure, and challenges in decarbonising heating, transport, and some parts of industry. Focused investment in skills, technology, and support is seen by many respondents as being vital for achieving Northern Ireland's climate objectives. A comment included:

“A partnership between industry, educational institutions, government and trade unions is needed to close the skills gap.”

Question 2: Summary of quantitative analysis

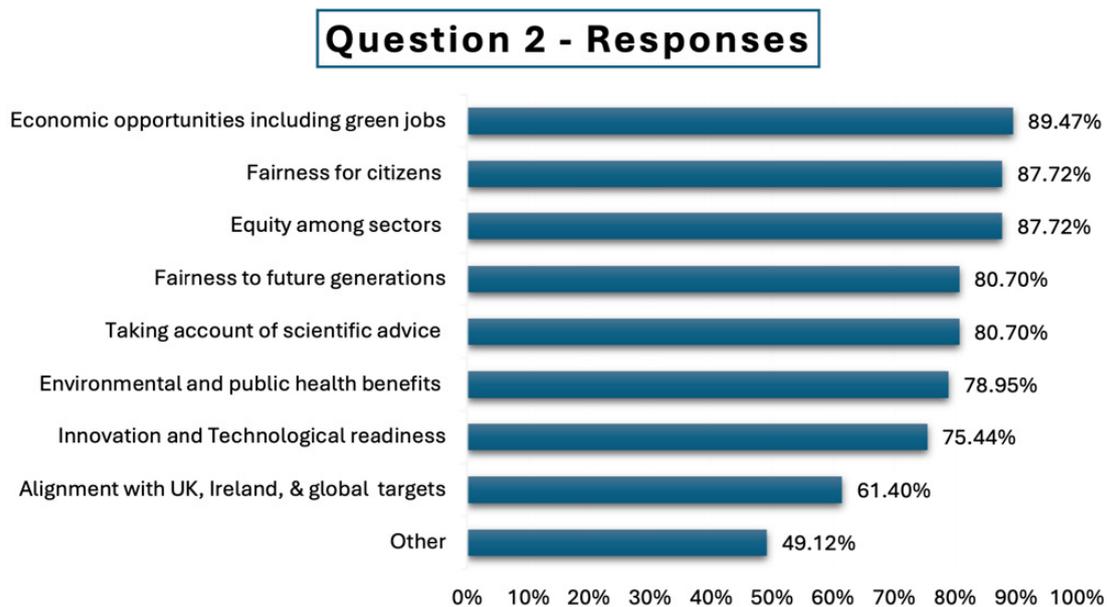
NI must balance ambition in reducing emissions with many other considerations including economic and social considerations and fairness for future generations.

Question 2. Whilst DAERA must set carbon budgets in line with the targets in the Act, what considerations/factors are important to you?

Question 2 sought views on what considerations/factors are important to people in setting the Fourth Carbon Budget.

There were 57 responses to this question. Respondents had the option to select as few or as many of the suggested options provided as they wished, or to provide other suggestions.

The Table below details the options for Question 2 and the percentage of respondents who considered the individual factors to be important. Respondents also had an opportunity to add narrative to support their response.



Question 2: Summary of qualitative analysis

Respondents to Question 2 were asked of the options provided which they saw as being of most importance. In addition to selecting options respondents had the opportunity to add narrative to support their response, on what considerations and factors they felt are important in setting the Fourth Carbon Budget.

Economic opportunities including Green jobs

Responses stated that the shift towards a low-carbon economy is a significant opportunity to drive economic growth, create new employment prospects, and revitalise rural communities. By aligning environmental ambitions with economic policy, Northern Ireland can stimulate investment in green sectors, support small and medium-sized enterprises, and develop a skilled workforce equipped for the jobs of the future was included in commentary:

“The transition to a low-carbon economy offers a once-in-a-generation opportunity for Northern Ireland to attract clean energy investment, create high-value jobs, and stimulate rural and regional economic development.”

Respondents highlighted that green jobs offer a pathway to prosperity that does not come at the expense of the environment, fostering inclusive growth and ensuring that the benefits of the transition are widely shared, for example:

“A stable, predictable policy trajectory will enable private investment, supply-chain diversification, and the creation of high-quality green jobs.”

Fairness for citizens and Future Generations

Some respondents expressed views that climate policy should support social justice, protecting children, young people, and low-income groups by addressing and reducing inequalities.

“Equity among sectors and fairness for citizens are central to ensuring that no community or industry is left behind, especially young people and future generations.”

Some respondents called for ‘inclusive decision-making’ which involves government, stakeholders, and communities ensuring a just transition for those who will potentially be impacted by economic change. They called for policies to be transparent, participatory, and designed to deliver effective and equitable carbon budgets without leaving anyone behind.

“With the right policies and support in place to ensure a just transition, significant economic, environmental and public health benefits can be unlocked.”

Equity among sectors

There was an appreciation from some respondents of the need to achieve fairness in emissions reductions which would require that all sectors, including industry, agriculture, transport, and households, contribute appropriately to climate action whilst recognising differing capacities to reduce emissions with one respondent commenting:

“All sectors should play their part in reducing emissions, but policies must recognise differing capacities and ensure that no community or group is left behind.”

Responses acknowledged the distinct challenges rural areas and agriculture face, as their capacity for change to reduce emissions differs from urban and industrial sectors. Policies

should reflect these differences with targeted support and incentives, helping ensure that the transition to net zero is fair for all groups.

Taking account of scientific advice and the particular circumstances of Northern Ireland

There were some comments that effective policy should use scientific evidence and consider Northern Ireland's unique rural landscape, emissions profile, and infrastructure. Grounding decisions in robust data ensures targeted and practical solutions that maximise impact with one response stating:

“Policy must therefore be shaped by real-world evidence, field data and ongoing review.”

Environmental and public health benefits

Another key topic raised was that implementing nature-based solutions such as reforestation and restoring natural habitats will play a crucial role in achieving carbon neutrality, while simultaneously fostering biodiversity and supporting broader environmental objectives. Safeguarding the natural environment is fundamental to effective climate policy, offering lasting benefits for both people and wildlife. One respondent stated:

“Reforestation and restoration projects should focus on native species that strengthen local ecosystems, sequester carbon effectively, and improve resilience against pests, disease, and climate change.”

There was recognition among a number of responses for the need to adopt ambitious carbon budgets which will bring advantages that go well beyond cutting emissions. Improvements like cleaner air, healthier living conditions, and enhanced public health contribute to a better quality of life, help to reduce health inequalities, and alleviate pressure on healthcare systems was a point made by a number of respondents, for example:

“Carbon reduction measures should be implemented in ways that deliver co-benefits, including improved public health, better air and water quality, nature recovery, and more liveable communities.”

Innovation, Technological Readiness

Some responses highlighted the need for investment in emerging technologies, modern infrastructure, and that advanced skills are key for supporting Northern Ireland's low-carbon transition. Several responses highlighted that supporting innovation, research, and partnerships between government, industry, and education can accelerate carbon reduction and keep the region at the leading edge. One response remarked:

“Innovation and technological readiness will be key to unlocking practical solutions, but government must also provide sustained investment and policy certainty.”

Many respondents highlighted that moving to a low-carbon economy presents opportunities for growth, job creation, and rural renewal. Aligning climate and economic goals will boost investment in green industries, support SMEs, and build a workforce ready for future green jobs, ensuring benefits are broadly shared:

“A stable, predictable policy trajectory will enable private investment, supply-chain diversification, and the creation of high-quality green jobs.”

Maintaining alignment with UK, Ireland, and global emissions reduction targets

Some respondents highlighted that aligning with UK, Irish, and international climate commitments is essential for Northern Ireland to contribute effectively to global climate efforts and to competitively attract investment. Consistency with broader targets offers clarity to businesses, supports cross-border collaboration, and helps the region maintain competitiveness and adopt best practices:

“Consistency with these broader targets provides clarity for businesses and investors, facilitates cross-border collaboration, and prevents the region from falling behind in adopting best practices.”

Other considerations or factors:

In addition to having the opportunity to provide supporting narrative against the eight named options respondents could also provide details of additional areas under the 'Other' heading. Recurring themes highlighted by respondents included ensuring a just transition, financial considerations and food security.

Ensuring a Just Transition

There was a strong call for an inclusive process that brings together government departments, stakeholders, and communities in collaborative decision-making. The principle of a “just transition” is central to the Climate Change Act, advocating for fairness and robust support for those whose livelihoods may be affected by the shift to a greener economy. The just transition approach seeks to ensure that no one is left behind, that policy design is transparent and participatory, and that the delivery of carbon budgets is both effective and equitable. A comment included:

“A just transition must be at the centre of policy, delivering economic opportunities such as green jobs, skills development, and investment in renewable energy, while addressing social inequalities and supporting those most vulnerable to climate and economic impacts.”

Over a fifth of responses, both from individuals and from organisations mentioned just transition or referenced fairness in their response. This came across strongly in responses from local government, business and the private sector, energy organisations and agricultural and environmental organisations. Several responses specifically referenced the important role of the Just Transition Commission and called for it to be established as soon as possible.

Financial Considerations

Affordability was a key concern highlighted by several respondents, with widespread recognition of the need for well-designed funding mechanisms and resource allocation to ensure that the costs and benefits of climate policies are shared fairly with one response advising:

“In particular, costs must remain affordable, and benefits shared fairly across all demographics of NI society.”

Some respondents highlighted the importance of providing adequate support, while also ensuring that investments deliver value for money and stimulate broader economic benefits. This was seen as being vital for building public trust and securing ongoing commitment to long-term climate goals. A comment concluded:

“An early priority must be to review the plan for funding and the distribution of costs for businesses, households and the Exchequer.”

Food Security

Some responses stated it was important to consider protecting local food production capacity and preventing carbon leakage, where emissions reductions in one area are offset by increases elsewhere globally. This was seen as being of particular importance to agricultural communities. Comments include:

“We would also like to highlight the need for Food Security (on a UK basis) to be considered when setting carbon budgets as well as the impacts of carbon leakage.”

Some respondents commented that we must ensure that we do not inadvertently threaten the viability of local food systems. The importance of supporting sustainable agricultural practices and safeguarding food security whilst improving the environment was highlighted. Comments included:

“Fairness to future generations must include economic stability and food security as well as environmental targets.”

The Climate Change Act (Northern Ireland) 2022 includes a legal safeguard requiring every department to assess and minimise the risk of carbon leakage when developing policies, ensuring that climate action does not unfairly shift emissions or disadvantage Northern Ireland's key sectors.

Question 3: Summary of qualitative analysis

Northern Ireland taking action to meet the proposed Fourth Carbon Budget may have impacts and bring benefits to society. The Department recognises specific benefits and impacts will be dependent on emissions reduction policies that are agreed by the NI Executive closer to 2038.

Question 3. Do you have any views on the potential impacts (positive and negative) that will be realised in Northern Ireland reducing its emissions to meet the proposed Fourth Carbon Budget?

You may wish to consider the impacts /benefits in the categories below:

A) Financial impacts

B) Economic impacts

C) Social impacts

D) Rural impacts

E) Equality impacts

F) Impact on children and young people

Respondents were asked to detail the potential impacts that they felt would be realised to meet the proposed Fourth Carbon Budget against the six areas outlined above. Respondents could provide supporting narrative against all six areas or choose to only provide narrative against specific impacts. There were 72 responses received to this question.

Financial Impacts:

Respondents raised concerns regarding financial implications for households, businesses, and the public sector. There was a consistent theme that without the right policies and interventions that there could be upfront costs for households transitioning to low-carbon technologies (e.g., home heating, electric vehicles), personal debt, and economic hardship, especially for low-income and rural communities:

“The upfront costs associated with these measures could present significant barriers for many without access to suitable financial support, grants, or low-cost finance schemes.”

However, there was also broad recognition by some respondents that, with adequate support and planning, long-term savings and resilience can be achieved through improved energy efficiency and reduced reliance on imported fossil fuel with commentary including:

“While there may be upfront costs associated with transitioning to low-carbon technologies, these or other investments will lead to long-term savings for citizens (e.g. through energy efficiency).”

Economic Impacts:

Responses highlighted the potential for both new job creation in areas such as renewable energy, retrofitting, and green infrastructure whilst also recognising that for some high emissions sectors to avoid job losses there would be a need to support workers with skills retraining as part of the transition. One comment raised was:

“A well-managed transition could drive new opportunities in renewable energy, agriculture, and low-carbon infrastructure, creating green jobs and long-term economic resilience.”

The importance of retraining and supporting affected industries was emphasized in several comments:

“High-carbon industries may face disruption, requiring retraining and support to avoid job losses and economic displacement.”

Social Impacts:

Improved public health (cleaner air and water, warmer homes), community wellbeing, and reduced health costs are widely seen as positives, by many respondents in their comments:

“Cleaner air, warmer homes, and improved public transport can enhance health and wellbeing, particularly in urban and deprived areas. Community-led climate action can foster cohesion and empowerment.”

However, there were concerns raised by some respondents that poorly designed or unfair policies could widen inequalities, increase fuel poverty, and reduce social cohesion, especially if vulnerable groups are not supported. Comments included:

“Forcing expensive technology changes could widen inequality between those who can afford “green upgrades” and those who cannot. Policies that ignore affordability risk creating resentment and division rather than public support.”

Rural Impacts:

Rural communities were frequently highlighted by respondents as potentially being at greater risk of being impacted by change, due to their dependence on oil heating and more limited public transport options. Concerns raised included the viability of small farms, potential depopulation, and erosion of rural culture and services. Some comments included:

“Rural areas can benefit from renewable energy projects, such as solar farms, but care must be taken to protect rural incomes from abrupt shifts in agricultural models and preserve natural landscapes and biodiversity.”

Some responses also highlighted opportunities, given the right support, for rural areas through areas such as renewable energy. One response commented:

“There are significant opportunities for rural areas to lead the way in renewable energy generation, sustainable land management, peatland restoration, and farm diversification. These initiatives can create new income streams while also enhancing biodiversity and resilience.”

Equality Impacts:

The need for fairness and the application of “just transition” principles recurred frequently throughout the responses received for this question. Many responses stressed that policies must not disproportionately impact low-income, older, disabled, or rural populations in their comments:

“A fair transition means ensuring all communities can benefit from clean energy and that those in fuel poverty or without access to clean technologies are prioritised in policy design.”

There were calls by some respondents for targeted support, retraining, and inclusive engagement to ensure benefits are shared and burdens are not unfairly faced by some. Comments included:

“There will be impacts and it important that government assess all impacts and apply the just transition principle where possible.”

Impact on Children and Young People:

Several responses highlighted the potential implications for younger generations, both in terms of safeguarding their future environment and ensuring access to affordable homes and new employment opportunities in their comments:

“Strong and well-targeted climate action has the potential to safeguard future generations from the most severe impacts of climate change while creating new employment opportunities and pathways in the green economy.”

There were some concerns raised that a poorly planned transition could harm children's welfare, whilst recognising that a well-managed transition could create new opportunities and protect their future. Concerns included:

“If the transition to a low-carbon economy is not carefully planned, there is a risk that today's young people could face reduced opportunities in traditional sectors without adequate investment in training, reskilling, and future-ready skills development.”

In developing the Regulations DAERA has undertaken a number of impacts assessments including:

- Equality Impact Assessment Screening
- Rural Needs Impact Assessment
- Financial, Social and Economic Impact Assessment
- Children's Rights Impact Assessment

- Regulatory Impact Assessment
- In addition to setting a carbon budget DAERA has to take account of a number of social, environmental and economic factors under Section 26 of the Act.

The data gathered from this part of the consultation will help to inform each of those assessments.

Question 4: Summary of qualitative analysis

Question 4. This question is to provide you with the opportunity to add anything further that you have not already had an opportunity to do so regarding the Fourth Carbon Budget.

Respondents had the opportunity to add additional narrative to support their overall response to the consultation in Question 4. There was a significant variation in the level of detail, length and style of the responses received to this question. Whilst most responses were succinct, there were those that were particularly detailed. In total 60 responses were received to this question with the main themes raised being:

Just Transition, Rural Support, and Fairness:

A significant number of respondents highlighted that a 'just transition' is crucial to ensure rural communities are not left behind as climate policies are implemented.

"There is widespread emphasis on ensuring a just transition that protects rural communities, balances economic, social, and environmental sustainability, and provides appropriate support for vulnerable sectors and regions."

Some responses emphasised the need for a balanced approach that considers economic, social, and environmental factors. There was strong support for targeted aid to vulnerable regions and sectors, with equity across geographies, industries, and lower income groups viewed as key to public trust. Respondents stress that fairness must guide policy so transition costs and benefits are shared without worsening inequalities.

"Any climate plan must be fair, ensuring that the burden and benefits of action are equitably distributed."

Role and Challenges of Agriculture and Food Security:

Respondents commented that agriculture, particularly the dairy industry, is central to Northern Ireland's rural economy, underpinning food security and supporting rural communities. Respondents highlighted the local agricultural sector's strong carbon efficiency compared to global standards and raised the importance of ensuring that emissions restrictions should not harm local producers, create food insecurity or raise consumer prices. Some concerns around the risk of increased reliance on less efficient foreign imports creating 'carbon leakage' were also raised:

"As products from outside NI are unlikely to match the carbon efficiency of the NI industry, then the overall effect on global emissions would probably be negative."

There was support in the responses for recognising on-farm carbon sequestration, and opportunities for promoting renewable energy, emphasising that agriculture should be viewed

as, and can be part of the environmental solution, rather than merely viewed as a source of emissions.

“A balance is needed to deliver sustainable local food production, which is the backbone of rural communities and the NI economy, but also for the environment.”

Technological Innovation and Nature-Based Solutions:

There was broad support in the responses for leveraging both technological and nature-based solutions to meet emissions reduction targets and enhance resilience to the impacts of climate change. Several respondents advised that they welcomed the expansion of biomethane, hydrogen, and renewable energy projects, as well as measures to improve farm efficiency in their responses.

“Hydrogen can be a cornerstone of Northern Ireland's net zero pathway. With exceptional wind resources, Northern Ireland is well-positioned to lead in green hydrogen production.”

Nature-based solutions such as tree planting and peatland restoration were also widely backed by respondents, with many recognising their potential to deliver significant co-benefits for both climate (mitigation and adaptation) and ecosystem health. A comment remarked:

“Peatland restoration, woodland creation, agroforestry, improved nutrient management, diversified rotations and wider low-carbon farming practices are already supported by the CCC and provide strong co-benefits for biodiversity and water quality.”

Public Engagement, Education, and Transparent Governance:

Many responses underlined the importance of engaging the public and ensuring widespread understanding of, and participation in, the development of climate policy.

“Raising awareness about the benefits of emissions reductions and involving communities in decision-making will foster a sense of ownership and commitment to the targets, rather than viewing climate targets as a threat or burden.”

Greater inclusivity in just transition policy formation, to reflect the voices of all affected groups, was also raised. One respondent stated:

“Establishing community advisory structures linked to just transition governance would ensure citizens most affected by climate and health inequalities have a voice in delivery.”

Strategic investment, Coordinated policy and Infrastructure:

A clear theme emerging from respondents was on the need for sustained, strategic investment and coordinated policy action to effectively deliver on climate, energy, and infrastructure ambitions. The need for long-term funding, actionable delivery plans, and practical mechanisms was seen as fundamental for credible progress.

“Adequate, long-term, and ring-fenced funding is essential to enable delivery, particularly for local authorities who will play a frontline role in supporting communities and implementing practical measures.”

Respondents also raised the need for joined up and coordinated interdepartmental efforts to help unify policies and increase their impact and prevent negative outcomes.

“We encourage DAERA to ensure that robust monitoring, transparent reporting, and adaptive policy mechanisms are embedded within the carbon budgeting framework to build confidence in its delivery.”

Other Notable themes:

Additional, though less commonly cited themes included the importance of advancing the circular economy and innovative waste management practices, expanding renewable energy infrastructure such as wind, solar, and hydrogen, and establishing clear sectoral pathways and milestones. One comment stated:

“The Fourth Carbon Budget underplays the contribution that the circular economy could make to delivering the stated targets.”

Some comments highlighted the need to integrate health equity and broader social impacts into climate planning, while others cautioned against over-reliance on unproven negative emissions technologies or offsetting strategies, advocating for a focus on proven and deliverable solutions in their responses, for example:

“To ensure that delivery is both fair and effective, we recommend that the framework is strengthened by embedding health equity, wellbeing, and participation as cross-cutting priorities.”

Next Steps

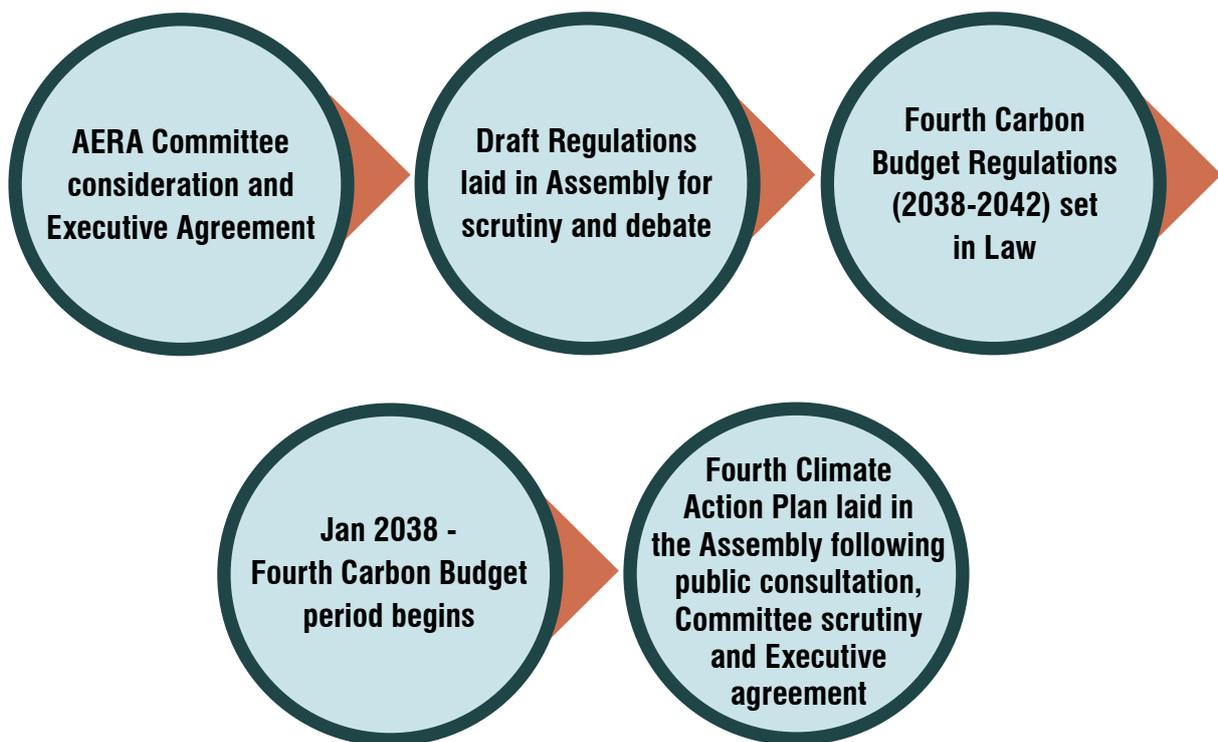
Next Steps

The Department would like to thank everyone who took the time to engage with DAERA and respond to the consultation.

The responses received to the consultation will be used to inform policy decisions in the draft Regulations before they move to the next stage of the legislative process.

The draft Regulations which set the Fourth Carbon Budget, will be brought to the NI Executive for their agreement to lay the draft Regulations in the Assembly for debate and approval. Once the draft Regulations become law, meeting the fourth carbon budget will be a legislative requirement for Northern Ireland and will provide clarity and a clear trajectory for Northern Ireland's pathway to a lower carbon society and economy.

The next steps for setting the Fourth Carbon Budget are illustrated in the diagram below.



Glossary of terms

We have provided this glossary for some of the key terms that have been used in this document.

Carbon budget	A carbon budget provides a limit on the maximum total greenhouse gas (GHG) emissions which should not be exceeded for a defined budgetary period, in order to help meet overall and longer-term emission reduction commitments.
Climate Action Plan (CAP)	A Climate Action Plan sets out the policies and proposals that departments will implement to meet the corresponding carbon budget as well as set out how the emissions targets will be achieved. This will contain actions from every NI department and will be consulted on and laid in the NI Assembly.
Climate Change Committee (CCC)	The UK Climate Change Committee is the statutory, independent, climate change advisory service to the UK Government and all UK Devolved Administrations (including NI).
Greenhouse Gas (GHG)	Greenhouse gases (GHGs) absorb heat from the Earth's surface and remain in the atmosphere for decades to centuries. They trap significant heat, similar to a greenhouse trapping the sun's rays. The seven main gases are: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulphur hexafluoride, and nitrogen.
Just Transition	The Intergovernmental Panel on Climate Change (IPCC) defines a just transition as a set of principles, processes, and practices that ensure no people, workers, places, sectors, countries, or regions are left behind in the transition from a high-carbon to a low-carbon economy.
Net emissions	The amount of emissions of a greenhouse gas (or gases) for a period minus the number of removals of the gas (or gases) for the period. Emissions can be released into our atmosphere from a number of sources such as a result of our industrial activities, using transport, heating our homes and offices, and from our agricultural livestock. Removals of a gas can be through land use, land-use change, and forestry and through carbon capture and storage technology.
Net Zero	Net Zero means not adding to the amount of greenhouse gases in the atmosphere. This involves reducing greenhouse gas emissions as much as possible and balancing out any that remain by removing an equivalent amount.
SME	SME's or Small and Medium-Sized Enterprises refers to businesses that operate on a smaller scale compared to large corporations, encompassing various types such as sole proprietorships, partnerships, and limited companies.
'The Act'	The Climate Change Act (Northern Ireland) 2022.



Department of
**Agriculture, Environment
and Rural Affairs**

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