

## Small-Scale Green Energy Bill Survey

*A response from RSPB Northern Ireland, 18 November 2021*

### [Introduction](#)

#### The RSPB

The RSPB is the largest conservation organisation in Europe, with more than 1.2 million members, over 2,000 employees and around 12,000 volunteers. It has over 200 nature reserves across the UK, wild havens where everyone can get closer to nature and home to 80 per cent of our rarest or more threatened bird species. The RSPB also works internationally and is a leading player in BirdLife International, a partnership of conservation organisations working to save nature across the world.

RSPB NI welcomes the opportunity to comment on the Small Scale Green Energy Bill Survey.

#### [A sustainable energy transition: joint solutions for climate and nature](#)

The RSPB supports urgent action to tackle the climate and nature emergency. Energy supply is responsible for around 20% of Northern Ireland's greenhouse gas emissions. Effective emissions reduction action requires de-carbonisation of the energy sector.

Decarbonising energy is a vital part of efforts to reach net zero. However urgent action is required to ensure action on climate change does not increase the threat to nature. In order to phase out fossil fuels, the deployment of renewable technology must be significantly increased – in the right places. Unchecked and without action to alleviate additional pressures, renewable energy deployment – particularly offshore wind – looks set to significantly threaten the future of our wildlife including globally important breeding seabirds. A sustainable energy transition as part of a Green Recovery offers the potential to decarbonise in harmony with nature by deploying well-sited renewables, ensuring a mass roll out of energy efficiency measures and implementing meaningful conservation measures to ensure thriving wildlife. Action must be urgent and transformative; failure to act within this decade – indeed within the early 2020s – risks potentially devastating and irreversible effects on nature, our planet and Northern Ireland's ability to ensure the sustainable and timely energy transition necessary to reach net zero.

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The RSPB is part of BirdLife International, a partnership of conservation organisations working to give nature a home around the world.

**Patron:** Her Majesty the Queen    **Chairman of Council:** Kevin Cox    **Chief Executive:** Beccy Speight

**Director RSPB NI:** Joanne Sherwood    **Chair of Committee for Northern Ireland:** Judith Annett

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

### A climate and ecological emergency

The threat of climate change is reflected throughout the State of Nature Report 2019<sup>1</sup>:

*“Climate change, caused by human activities, is one of the most significant threats to global biodiversity, and is projected to become increasingly severe through the course of this century...There is growing evidence that climate change is driving widespread and rapid changes in the abundance, distribution and ecology of the UK’s wildlife, causing changes to species communities and will continue to do so for decades or even centuries to come. Conserving and restoring nature-rich areas of the UK will contribute to mitigating climate change and benefit species, while strategies to counter the negative effects of climate change will help species to adapt to its increasing influence in future”.*

The scale and urgency of the planetary crisis is intensifying and there is a growing political consensus that we face a climate and ecological emergency<sup>2</sup>. We know that without urgent action to tackle climate change, millions of species will be at risk of extinction.

As both the Intergovernmental Panel on Climate Change (IPCC) and Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) make clear, the climate and biodiversity crises are indivisible, and we will not stay within 1.5°C of warming without addressing the biodiversity crisis. Therefore, the implications of the 2019 IPBES report detailing the biodiversity crisis and its implications should be very much considered as integral to action on climate and not considered in isolation. Furthermore, the need to address wildlife concerns was also noted by the Climate Change Committee (CCC) in the 6th Carbon Budget (2020).

The Intergovernmental Panel on Climate Change’s (IPCC’s) most recent report has made it clear that globally we must reach net zero emissions by 2050<sup>3</sup>; **RSPB NI is calling for a more ambitious target of net zero greenhouse gas emissions by 2045 at the latest.**

The IPCC highlights that “*rapid, far-reaching*” and “*unprecedented*” changes to the way society operates are needed to tackle the climate crisis. It also highlights the devastating impacts on ecosystems of failing to achieve the emissions reductions needed to limit temperature rises to 1.5°C.

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<sup>1</sup> <https://www.rspb.org.uk/our-work/state-of-nature-report/>

<sup>2</sup> Energy motion passed by Stormont - <https://niassembly.tv/climate-emergency-debate-3-february-2020/>

<sup>3</sup> The 2050 target is supported by the Committee on Climate Change (CCC). The Climate Change Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This target is supported by the CCC. Due to the magnitude of the threat and urgent need for action to limit global temperature increase the RSPB is calling for net zero by 2045.

A net zero future therefore requires urgent action in this decade to change our energy system, shifting from dependence on fossil-fuels to increased generation from renewable sources as well as greatly reducing our overall energy demand. Amid a nature and a climate emergency, the need to reconcile the challenge of increased low carbon infrastructure deployment and threats to biodiversity has never been more urgent.

The UK Government, as host of the upcoming 2021 UN climate summit in Glasgow, has already expressed its ambition to be a global leader in the fight to save nature. As noted in the RSPB's [A Lost Decade for Nature](#), if these claims of leadership are to be credible, the UK will need to set out how it plans to fill the gap between rhetoric and reality in its own backyard. Governments must take the urgent action needed to change the fortunes of wildlife and reach greenhouse gas emissions targets as part of coordinated action for a sustainable energy transition.

The Executive and the Assembly should show leadership in this hugely important year for Climate and the NI Assembly must legislate for an ambitious Climate Change Act which includes an overarching target to achieve net zero greenhouse gas emissions by 2045. A Climate Change Act should place a duty on relevant government Departments to develop robust and ambitious sectoral Climate Action Plans covering areas such as energy.

## The Survey Questions

Please note that the number of the questions follows that of the Survey, and not all questions have been answered:

### **5. Do you agree that the Department for the Economy should support the growth of small-scale electricity generation in NI through this Scheme?**

Yes, providing any support for microgeneration projects which drive emissions reductions through maximising the contribution of renewables to the energy production mix should prioritise those projects delivering in harmony with nature, and should sit alongside measures to improve energy efficiency and reduce overall energy demand.

The encouragement of communities and individuals to begin using small-scale renewable energy, such as rooftop solar are not only important for delivering emissions reductions with low ecological risk, but also for increasing public engagement in climate action.

The RSPB supports the ambition to accelerate solar deployment and we believe this should urgently be progressed via the installation of rooftop solar and PV farms. The latter must be delivered in areas of low ecological sensitivity and alongside biodiversity enhancements. Rooftop solar has clear benefits for households, emissions reduction and little or no impact on nature. To support rooftop solar, consistent and accessible incentives and commitment from government are required.

**8. Do you agree with inclusion of the following objectives to be considered by the Department when devising a small-scale green energy scheme?**

**(i) Reducing dependency on non-renewable electricity supplied by the Northern Ireland electricity grid**

Yes, providing it is in harmony with nature as set out in our response to Q5 above.

**(ii) Reducing environmentally harmful emissions from farms and other businesses**

Other. See response to Q9 below for further details.

**(iii) Increasing the geographical and sectoral diversity of renewable energy inputs to the Northern Ireland electricity grid**

Other. See response to Q9 below for further details.

**9. Please elaborate and tell us about any other objectives which should be included.**

**RSPB supports a net zero target of 2045 for Northern Ireland.** A net zero by 2045 target is rooted in the overwhelming scientific evidence that we are living in a Climate and Ecological Emergency (IPBES, 2019; IPCC, 2018; among others) and that ambitious action is needed to limit global temperature increases. All parts of the UK should use their devolved powers to maximise their contribution to tackling the Climate Emergency by cutting emissions in line with a 1.5°C pathway. Historic failure to take decisive action should not stop NI becoming a leader in climate action.

Clause 1(6) of the Bill as introduced, should take into account the need for the robust assessment of any potential environmental impacts of small-scale green energy schemes under its objectives, over and above the current requirement to reduce environmentally harmful emissions from farms and other businesses.

It fails to examine the energy generation process which could fall under the parameters of this Bill, or the potential environmental impacts of the fuel source itself. In this regard, it does not seek to prevent any perverse outcomes via the growth of other sectors to provide fuel for small scale green energy production. For example, the recent IPCC-IPBES Workshop on Biodiversity and Climate Change stated that “intensive bioenergy crop production can negatively affect biodiversity and ecosystem services, including in adjacent land, freshwater and marine ecosystems through fertilizer and pesticide use or by increasing agricultural water withdrawals, thus also impacting on human capacity to adapt to climate change.”<sup>4</sup> As such there must be robust and transparent accounting and environmental assessment in place to enable judgements to be made on carbon negativity/neutrality and environmental impact.

Furthermore, Clause 1(6)(c) of the Bill as introduced, which seeks to increase the geographical and sectoral diversity of renewable energy inputs to the NI electricity grid fails to recognise the need for this to be in areas of low ecological risk, when not placed on existing buildings.

**While RSPB welcomes Clause 1(3)(f) which requires the Department to consult with persons appearing to the Department to have knowledge and experience in relation to environmental matters – as noted above this must include those relating to the generation scheme itself, its fuel source and not confine itself to only those relating to the reduction of environmentally harmful emissions from farms and other businesses, as set out in Clause 1(6).**

## Technologies

**15. Technologies: Do you agree with the inclusion of the main micro- generation technologies in the Bill as above.**

Other.

### [The onshore renewables energy mix](#)

At a time of **climate and ecological emergency**, the low carbon technologies we see playing a key role are renewables deployed in harmony with nature including by avoiding adverse impacts and maximising opportunities for nature recovery and resilience. In particular this includes onshore (and offshore) wind and solar deployed in the least ecologically sensitive areas as part of a strategically planned and timely energy mix which considers action and implications across an ecosystem not just at the project level. **This is likely to require support, which should prioritise those projects**

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<sup>4</sup> Pörtner, H.O., et al. 2021. IPBES-IPCC co-sponsored workshop report on biodiversity and climate change; IPBES and IPCC. [Online](#).

**considering delivering in harmony with nature and must be alongside energy efficiency and demand reduction measures.** This will also bring added benefits through energy security and reducing existing dependency on imported fossil fuels from volatile parts of the world.

We now consider the various forms of microgeneration listed in the survey as follows:

#### (i) Onshore Wind

There is an urgent need to maximise onshore wind deployment in areas of low ecological risk. We therefore call on the Assembly to ensure support for onshore wind in Northern Ireland is in harmony with nature. The ecological impact of an onshore wind deployment is determined by its location and scale with species potentially suffering disturbance, displacement and collision effects and important natural habitats being lost.

While RSPB supports the increased roll-out of onshore wind in harmony with nature, not only does this require deployment to be focussed in areas of low risk for wildlife, but consideration also needs to be given to the potential implications and cumulative impacts of microgeneration technologies when rolled out at scale. For example, a number of small scale individual wind turbines, if installed in multiple numbers across a proximate area can effectively constitute a windfarm, which would benefit from being considered strategically. Such a situation could potentially compound the issue of cumulative impacts from single turbines, which currently require planning permission. In this regard, under current policy, single turbines which develop (as a result of individual planning decisions) in clusters can in effect create a ‘wind farm’ by stealth without ever having to undergo the cumulative environmental rigors of an individual windfarm application comprising the same number of turbines as that created by the multiple applications for single turbines, or have the benefit of being considered strategically.

In the circumstances, guidance, and thresholds will be required to avoid the creation of ‘windfarms’ by stealth through multiple individual planning decisions in the absence of full environmental assessment of the ‘windfarm’ totality.

#### (ii) Solar

The RSPB supports the ambition to accelerate solar deployment and we believe this should urgently be progressed as rooftop and PV farms. The latter can be delivered alongside biodiversity enhancements in areas of low ecological sensitivity and the former has clear benefits for households,

emissions reduction and little or no impact on nature. To support roof top solar, consistent and accessible incentives and commitment from government are required.

Such incentives to encourage communities and individuals to begin using small-scale renewable energy, such as rooftop solar are not only important for delivering emissions reductions with low ecological risk, but also for increasing public engagement in climate action.

### (iii) Hydro

Hydro power developments can vary in size, type and operation, and the specifics of the design and management have a major influence on the severity of environmental impacts – even small to medium scale hydro schemes can have significant and lasting impacts on wildlife due to disturbance during construction, permanent loss of habitat, drainage of wetlands and bogs and disturbance to river continuity and natural river flows.

Given such potential risks to the natural environment, any incentives to encourage communities and individuals to begin using small-scale hydro power require to be set within a strong policy context where any financial support/contribution must ensure that decarbonisation through hydro is in harmony with nature.

### (iv) Dedicated bioenergy crops

A recent review of evidence for RSPB<sup>5</sup> has noted the following:

“Full life cycle analysis is necessary to calculate the net greenhouse gas balance of bioenergy (Koh et al., 2008). As well as during combustion, greenhouse gases are emitted during the operations of growing, harvesting, transporting and processing of bioenergy crops. Furthermore, growing energy crops competes with other land uses, such as food production, and may not lead to any significant net greenhouse savings due to indirect landuse change (Gove et al., 2010). **Direct land use change to grow bioenergy crops can increase net greenhouse gas emissions if carbon rich ecosystems like wetlands, forests and grasslands are destroyed in the process** (Chum et al., 2011). Theoretically, net sequestration from land use change could be achieved if bioenergy crops are planted on lands with carbon-poor soils where cultivation of food is not economically viable”. (our emphasis)

“The Committee on Climate Change (CCC, 2018a; CCC, 2018b; CCC, 2020) proposes that perennial energy crops (miscanthus, short-rotation coppice willow and short rotation forestry) could play a key

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<sup>5</sup> Crane E, (2020) Sustainable climate change mitigation in UK agriculture. A review of evidence for the RSPB

role in decreasing overall greenhouse gas emissions from the land sectors. Importantly, they propose that these crops could be grown on land that has been ‘freed up’ from current agricultural uses by changes elsewhere in the food system, thus avoiding negative impacts from indirect land use change.”

“Environmental impacts: Growing energy crops can bring all the biodiversity and resource protection impacts attendant on any intensive arable system. Specific impacts will depend on what the crop is and what land use it is replacing. Maize, for example, is a particularly challenging crop from an environmental perspective (Natural England, 2007). Direct or indirect land use change may cause significant environmental harm if areas of high natural value are encroached upon”.

The same report<sup>6</sup>, also refers to **Anaerobic digestion:**

“Anaerobic digestion (AD) of organic material can provide a substitute for both fossil fuels and manufactured fertiliser and thereby has the potential to reduce total greenhouse gas emissions. There are three main types of feedstock: energy crops, animal manures and other organic wastes (Amon et al., 2007). Within the context of the EU goal to supply 20% of European energy demands from renewable sources by 2020, it has been estimated that over 25% of bioenergy demands could be met from biogas sourced from animal manure, crop silages, feed residues etc. (Holm-Nielsen et al., 2009)”.

“AD plants can be either on- farm or centralised. On-farm plants will typically require co-digestion of manures with high gas-yielding feedstocks such as maize in order to be economic, which reduces the overall greenhouse gas savings and introduces environmental problems associated with growing the crop”.

“For AD approaches to offer genuine mitigation, they must not drive unsustainable production systems – for example, high input livestock systems –associated with wider negative environmental impacts”.

“Environmental impacts: Fermented slurry from AD typically has a high readily available nitrogen content, therefore carrying a risk of nitrate leaching. Digested slurry also has a higher pH than raw slurry, increasing the potential for ammonia emissions”.

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<sup>6</sup> Crane E, (2020) Sustainable climate change mitigation in UK agriculture. A review of evidence for the RSPB



“Biogas plants have additional environmental impacts, for example particulate matter emissions and photochemical ozone formation potential”.

#### [Onshore renewables in harmony with nature](#)

The nature of the above evidence means that it is more important than ever that any future micro-generation legislation is only supporting emissions reductions options and policies that actually drive emissions reductions, and deliver genuine climate benefits (and avoid practices like bioenergy). There is a strong scientific consensus that bioenergy, due to a failure to account for carbon debt, and policy failings leads to emissions rather than removals within the relevant mitigation period. This [evidence](#) is synthesised by the European Academy of Sciences paper.

**The legislation must therefore focus on zero-emissive renewable energy and energy conservation and efficiency, all in harmony with nature.** They should not support high-carbon sources of energy, including from forest biomass or gas (CHP),<sup>7</sup> or higher ecological risk sources. **Any financial support/contribution must also ensure decarbonisation in harmony with nature.**

#### Review and Revision

**16. Do you agree that the Department for the Economy should review the Scheme “from time to time”?**

**17. Do you agree any review of the Scheme should consider the following: - Macro-economic conditions; - Unit cost prices of renewable energy; and - The financial stability and performance of electricity providers.**

Other.

While RSPB welcomes the commitment in Clause 3(1) of the Bill as introduced to review, it is much too vague in its current form (i.e a requirement from time to time). A set review period is required which is measurable against certain criteria in order to identify areas of success or concern.

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<sup>7</sup> Any proposal/incentive by the NI Government to switch to gas as a heating source should be aligned to the UK Committee on Climate Change recommendation that “all new homes built from 2025 at the latest should be ultra-energy efficient and should not be connected to the gas grid.” - UK Committee on Climate Change ‘Reducing UK emissions 2019 Progress report to Parliament July 2019 p59

Of equal concern is the lack of regard to any environmental considerations as part of the review (as set out a Clause 3(2), of the Bill as introduced with the requirement to focus on all relevant economic conditions. Clause 3 needs strengthened to include environmental considerations.

### **Suspension, Costs and Comments**

**18. Suspension and Revocation: Do you agree that the Department for the Economy should be able to suspend or revoke the Scheme, or part thereof?**

RSPB welcomes the provisions of Clause 4 and in particular the power to suspend or revoke where it appears to the Department that any aspect of the scheme is having, or is likely to have, unintended and harmful consequences. However, no timescales are set out for such procedures, save those which are contained within Clause 4(2), therefore, for the avoidance of doubt and to allow prompt corrective action(s), timescales and procedures must be clearly defined within Clause 4(2).

Furthermore, it is not clear from Clause 4, as to how schemes are to be monitored, and thus allow the conclusion to be drawn by the Department that an aspect of a scheme is having, or is likely to have, unintended and harmful consequences. To allow for meaningful review and assessment of consequences, methods and timescales for scheme monitoring should be clearly set out and should also include the provision for assessment of unintended and harmful consequences either alone or in combination.

**20. Any additional comments?**

**Guidance – as set out in Clause 5 of the Bill as introduced.**

Clause 5 states that the Department **may** give guidance about the operation of the small-scale green energy scheme and the pursuit of the small-scale green energy scheme. In the circumstances, RSPB NI recommends that guidance in this context should be provided by the Department and should include the **requirement to decarbonise in harmony with nature by deploying well-sited renewables in areas of low ecological sensitivity. Such guidance should also link to planning policy requirements to ensure any projects coming forward have been robustly assessed within the development management context.**

### Other commentary

#### The need to learn lessons from the deployment of renewables elsewhere

The NI Assembly should learn lessons from the deployment of renewables elsewhere in the UK and Ireland, and ensure that a sustainable and strategic approach to renewables deployment is adopted at all scales, led by strategic government plans<sup>8</sup>. Strategic planning will ensure that the potential impacts of infrastructure development are avoided at the earliest possible stage providing greater certainty for developers and identifying the most sustainable pathways to climate targets. Only then can we be confident that such an approach delivers for people, climate and nature.

Research and monitoring must be mobilised to provide a robust evidence base to identify the most important areas for habitats and species and where human activities are likely to cause less harm and understand how development impacts (either individually or in combination) impact on nature; and strategic planning must ensure sustainable development at a project and ecosystem level.

Decarbonisation must be achieved through a low carbon renewables energy mix and substantial roll out of energy efficiency measures.

Investment which drives development must be in harmony with nature.

#### Energy efficiency

Energy efficiency is a no regrets option, which can deliver significant short-term emissions reductions with no or minimal risk to wildlife while stimulating economic recovery through job creation and delivering social benefits.

Any support for microgeneration projects which drive emissions reductions through maximising the contribution of renewables to the energy production mix should prioritise those projects delivering in harmony with nature, and should sit alongside measures to improve energy efficiency and reduce overall energy demand.

Energy efficiency is vital to reconciling energy demand and nature conservation, by reducing overall consumption levels and therefore making the energy generated from low carbon technology, power more. There is almost universal recognition of the benefits and clear support from the CCC; political

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<sup>8</sup> Based on the best available evidence (enhanced by monitoring and research) to identify the least environmentally sensitive locations for development and fit for the purpose of decarbonising (i.e. ensuring the sustainable and timely deployment of renewables and phase out of fossil fuels).

action is required to drive forward robust and coordinated delivery both in terms of retrofitting existing buildings and ensuring new builds meet net zero standards. The role of consumer, individual and household in delivering emissions reductions is potentially hugely significant and the RSPB supports the CCC recommendation to the UK government to make “*policies to improve energy efficiency for all buildings*” an urgent priority.

[RSPB's 2050 Energy Vision](#) report recommended that devolved Governments should designate energy efficiency as an infrastructure priority and implement ambitious policies to improve energy efficiency and reduce demand such as robust energy efficiency standards for new buildings and greater support for home insulation retrofitting. As of June 2015, the Scottish Government designated energy efficiency as a National Infrastructure Priority and subsequently implemented ambitious policies to improve energy efficiency and reduce demand. This includes robust efficiency standards for new buildings, a major programme of retrofitting home insulation, more efficient lighting and appliances and measures to encourage demand-side response.

A combination of accessible incentives and regulation (e.g. the ramping up the energy efficiency of new housing to achieve net zero and ensure all new builds have rooftop solar and ground/air source heat pumps where appropriate) would support accelerated decarbonising heat in buildings.

To date, Northern Ireland has not been included in the development of a Zero Carbon Homes policy or the new Future Homes Standard consultation which proposes that from 2025 all new-build homes will be “future-proofed with low carbon heating and world-leading levels of energy efficiency.” The latter of which is consistent (just) with the Committee on Climate Change recommendation that “all new homes built from 2025 at the latest should be ultra-energy efficient and should not be connected to the gas grid.”<sup>9</sup> Northern Ireland should follow suit with introduction of a similar standard.

Further action is required by both the Northern Ireland Executive and UK Government to regulate and incentivise energy efficiency and demand reduction measures to ensure emission reductions.

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<sup>9</sup> UK Committee on Climate Change ‘Reducing UK emissions 2019 Progress report to Parliament July 2019 p59

### Energy efficiency and demand reduction - learning lessons from elsewhere, and other benefits

While Northern Ireland to date may have been behind the curve in developing new energy efficiency policy, now is the time for it to learn lessons from elsewhere to decarbonise heat in buildings, and improve energy efficiency.

The sector within England was geared up for delivery of the former zero carbon homes policy, so there is scope to draw on that previous experience including the zero carbon homes hub.

Lessons should be learned from retrofitting policy which opted for complex incentives rather than regulation hindering uptake. To maximise the success and uptake of incentives, these must be accessible rather than complex. Complexity may have been a potential barrier to uptake of retrofitting incentives in England for example. In addition, the Northern Ireland Assembly must provide clear direction and maintain momentum and avoid for example, the stop-start nature of policy within England in relation to the decision to scrap zero carbon homes in 2016 when the building industry was ready to take this step – thereby ultimately undermining the delivery of energy efficiency mechanisms.

There should also be investment in a Green New Deal programme of public works to improve the energy efficiency of the housing stock and the public sector estate, with the added spin-off benefit of stimulating economic recovery through job creation by virtue of the public work programme roll-out. This will help facilitate a Just Transition for those workers who may be impacted by the low-carbon transition. As noted above, increased installation of renewables will present new job opportunities in the future.

Furthermore, the introduction of legislation such as a Warm Homes Act, which in setting out statutory targets for renewable heat uptake and energy performance of buildings to encourage progress, or amendments to the Northern Ireland Building Regulations to require the highest level of energy efficiency in all new builds, could both individually and cumulatively provide a long-term positive direction for energy efficiency and demand reduction; and certainty to industry regarding future investment confidence.

In terms of social benefits, low carbon and energy efficient heating also offer the benefit of reducing energy bills, supporting policy aspirations to ensure a secure and affordable energy supply. RSPB

research has shown<sup>10</sup> that reducing energy demand and improving energy efficiency are also important to ensuring that the energy system is affordable in the future. This is supported by other studies which suggest that reducing energy demand is a cost-effective way of reducing emissions and meeting the UK's climate change targets<sup>11</sup>.

### Economic incentives

The transition to Net Zero energy in Northern Ireland will require economic incentives to shape the energy mix. In the short term, support will be required for onshore wind and solar industries, which provide opportunities for significant and rapid decarbonisation of our electricity supply at low ecological risk, if sited and managed appropriately. In addition, the UK Government needs to end perverse subsidies for fossil fuels to create a more level playing field in which renewable energy can fairly compete, so that economic incentives pull in the same direction towards decarbonisation.

Economic incentives should be designed so that they do not incentivise projects that are likely to cause environmental damage.

### Summary

Amid a nature and climate emergency, the need to reconcile the challenge of increased low carbon infrastructure deployment and threats to biodiversity has never been more urgent. The RSPB agrees that reducing our dependence on fossil fuels and moving towards renewable forms of energy production is absolutely vital. In order to phase out fossil fuels, the deployment of renewable technology must be significantly increased – in the right places in harmony with nature to ensure action on climate change does not increase the threat to nature.

A sustainable and strategic approach to the expansion of these technologies (alongside energy efficiency and demand reduction) is necessary to deliver an energy transition that delivers for people, climate and nature at every level of deployment.

Economic incentives should be designed so that they do not incentivise projects that are likely to cause environmental damage.

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<sup>10</sup> <https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/the-rspbs-2050-energy-vision---summary-report.pdf>

<sup>11</sup> Steward T (2014). Demand and Decarbonisation in 2050: Themes from Scenarios. EPG Working Paper 1401. [projects.exeter.ac.uk/igov/wpcontent/uploads/2014/02/WP-6-Demand-and-Decarbonisation-in-2050.pdf](https://projects.exeter.ac.uk/igov/wpcontent/uploads/2014/02/WP-6-Demand-and-Decarbonisation-in-2050.pdf)

The imperative to act is clear; Government must ensure integrated and well-funded action for climate and nature to ensure we meet both ecological and net zero targets. Joint solutions must be at the heart of our Green Recovery and energy transition so that we can build a just, sustainable and resilient future.

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