



The Consumer Council

Elizabeth House
116 Hollywood Road
Belfast
BT4 1NY

Our ref: PD200101537

Climate Change Unit
Department of the Environment
Environmental Policy Division
Goodwood House
44-58 May Street
Town Parks
Belfast
BT1 4NN

20 May 2013

Dear Sir/Madam

Re: Pre-Consultation seeking views on the need for a Northern Ireland Climate Change Bill

The Consumer Council welcomes the opportunity to respond to this consultation.

The Consumer Council is an independent consumer organisation, working to bring about change to benefit Northern Ireland (NI) consumers. Our aim is to make the consumer voice heard and make it count.

We have a statutory remit to *promote and safeguard the interests of* consumers in NI and we have specific functions in relation to energy, water, transport and food (the Consumer Council and the Food Standards Agency (FSA) have a memorandum of understanding and the Council's strategic focus on food is primarily in relation to food prices and customer experience). These include considering consumer complaints and enquiries, carrying out research and educating and informing consumers.

The Consumer Council is also a designated body for the purposes of supercomplaints, which means that we can refer any consumer affairs goods and services issue to the Office of Fair Trading, where we feel that the market may be harming consumers' best interests.

In taking forward our broad statutory remit we are informed by and representative of consumers in NI. We work to bring about change to benefit consumers by making their voice heard and making it count. To represent consumers in the best way we can, we listen to them and produce robust evidence to put their priorities at the heart of all we do.

The Consumer Council wants to ensure that the sustainability agenda takes the consumer viewpoint into account. We believe also that as consumers, exercising our responsibilities is as important as exercising our rights. We are committed to promoting responsible consumerism and encouraging consumers to change their behaviour to benefit them today and tomorrow.

Our aim is to ensure consumers are provided with information, choice and value for money whilst the negative environmental impacts of the production and consumption of goods and services are minimised.

The Consumer Council also has a duty as a public body and a consumer representative to contribute to and promote the achievement of sustainable development which if done correctly, will not incur additional costs. We recognise that our day to day operations have an impact on the environment both locally and globally. The Consumer Council aims to lead by example, maximising the conservation and efficiency of its own energy and resource use thereby reducing environmental impact and unnecessary costs and maximising value for money.

We note the consultation document discusses the 'Stern Review of 2006' which highlights the importance of environmental protection. Stern highlights

that failure to reduce global greenhouse gas emissions will result in a 5 to 20 per cent loss of global GDP each year now and forever. However, if emissions are reduced in a low-cost way to a level that avoids the most dangerous risks of climate change, then the costs of acting could be as low as one to two per cent of global GDP by 2050.

The Consumer Council said in October 2010 in our response to the OFMDFM Sustainable Development Strategy implementation Plan consultation that we believed that Northern Ireland should have a long-term target for reduction of greenhouse gas emissions mirroring the commitment for an 80 per cent reduction in emissions by 2050 as set by the UK Climate Change Act. This target would help guide transition to a sustainable future, informing government, industry and consumers of the changes sustainable development will require in the long term. The Consumer Council recognises that a NI Climate Change Act would provide these targets in legislation.

The NI Government needs to be aware of the effect on households of any measures it takes towards reducing the impacts of climate change and be prepared to protect vulnerable households if necessary.

For example, the current Northern Ireland Strategic Energy Framework (SEF) contains a target of seeking to achieve 40% of its electricity consumption from renewable sources by 2020. This target would contribute significantly to a carbon reduction programme aimed at tackling climate change.

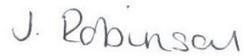
However, the higher energy prices that increased levies would create to meet a target of 40 per cent renewable electricity are incompatible with measures to reduce fuel poverty.

Therefore, whilst the Consumer Council is supportive of the reduction in greenhouse gas emissions the NI Climate Change Bill would seek to achieve, further information is needed to clarify what would be the potential financial

impact on consumers as a result of introducing such a Bill and what steps would be taken to protect vulnerable households.

If you wish to discuss the attached in more detail, please do not hesitate to contact Jenny Robinson on 028 9067 2488 or jrobinson@consumercouncil.org.uk.

Yours sincerely



Jenny Robinson
Consumer Affairs Officer