



Utility Regulator – NIE Networks RP7 Price Control Draft Determination - Consultation

A response from RSPB Northern Ireland, 22nd March 2024

The RSPB is UK's lead organisation in the BirdLife International network of conservation bodies. The RSPB is Europe's largest voluntary nature conservation organisation with a membership over 1 million in the UK, supported by over 11,000 of which live in Northern Ireland. Staff in Northern Ireland work on a wide range of issues, from education and public awareness to agriculture and land use planning.

We believe that sustainability should be at the heart of decision-making. The RSPB's policy and advocacy work covers a wide range of issues including planning and regional policy, climate change, energy, marine issues, water, trade and agriculture. As well as commenting on national planning policy issues. The RSPB's professional conservation and planning specialists engage with over 1,000 cases each year throughout the UK, including development plans and individual planning applications and proposals. We thus have considerable planning experience. The RSPB also makes over 100 planning applications a year on its own reserves and estate.

The RSPB firmly believes that nature should be a key consideration in all decision-making. Electrical infrastructure has the potential to have a significant impact on nature. Where nature is considered early on in the decision-making process, the risk of conflict is reduced. Cases such as the Hintlesham Woods¹ SSSI (Site of Special Scientific Interest)

¹ <https://www.rspb.org.uk/our-work/casework/cases/hintlesham-woods/>

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in England illustrates the issues that can arise when nature was not considered at the early stages of planning new electrical infrastructure.

RSPB NI welcomes the opportunity to comment on the Draft Determination of the NIE Networks RP7 Price Control. We wish to refer to our original response to the RP7 consultation which was run by NIE Networks in 2022, which we have attached as an appendix. Our comments roughly follow the structure of the Draft Determination document.

Climate change

The Intergovernmental Panel on Biodiversity and Ecosystem Services (IPBES)² and the Intergovernmental Panel on Climate Change (IPCC)³ make it clear that the nature and climate emergency is indivisible. The most recent UN Emissions Gap report identified that we are currently on track for 2.9 degrees of warming by 2100 – this would be devastating for wildlife and people⁴. Rapid decarbonisation is therefore vital but so is the protection and restoration of ecosystems which are also under pressure from land use change causing habitat loss and fragmentation, in addition to the threats posed by disease, pollution, disturbance and persecution, among other pressures. 12% of species on the island of Ireland are at risk of extinction⁵ and Northern Ireland ranks 12th worst out of 240 countries for biodiversity loss⁶. A quarter of our birds are now red-listed, meaning that they are the highest category of conservation concern⁷. Therefore, NIE must consider nature within its climate mitigation and adaptation.

Smart meters

We note that smart metering costs are excluded from estimates in several places. However, they remain a very important tool for the transition to a sustainable energy system. These have been described by the Department for Business, Energy and Industrial Strategy (BEIS) as playing a “vital role in decarbonising the energy sector” and “delivering secure, cheap and clean energy”⁸.

Energy efficiency

² [20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf \(ipbes.net\)](#)

³ [Sixth Assessment Report – IPCC](#)

⁴ [Emissions Gap Report 2023 | UNEP - UN Environment Programme](#)

⁵ <https://stateofnature.org.uk/countries/northern-ireland/>

⁶ <https://www.nhm.ac.uk/our-science/data/biodiversity-indicators/about-the-biodiversity-intactness-index.html>

⁷ Gilbert G, Stanbury A and Lewis L (2021), “Birds of Conservation Concern in Ireland 2020-2026”. Irish Birds 9: 523-544.

⁸ <https://www.gov.uk/government/consultations/smart-metering-implementation-programme-realising-non-domestic-benefits> , page 5



We particularly welcome the references to energy efficiency (in particular within 1.3, and 11.6 point 1). 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. Energy Efficiency is also 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 CCC⁹. Due to the reduced pressure on nature when energy efficiency is prioritised, we have some concerns regarding the limited scope of the proposed approach in 11.12 where shifting to renewables and network resilience are the primary drivers for pursuing energy efficiency, which on its own provides considerable benefits in terms of sustainability.

Well-planned renewables

We note the reference in 1.3 (b) to "Robust and well-planned infrastructure to maximise the use of locally- generated, low-carbon electricity, complemented by interconnection to other markets to access low carbon electricity produced elsewhere". We welcome the intention of this statement, in principle, but add that renewables must be well-planned to ensure that they are in harmony with nature specifically. Inappropriately sited renewable energy developments can have significant negative impacts on many bird species, including (but not limited to) collision and disturbance. It is therefore vital that onshore and offshore renewable energy deployment (both within Northern Ireland and beyond, where energy will be produced elsewhere and brought to Northern Ireland via interconnectors) is planned strategically and spatially in order to avoid the areas most sensitive for nature and that all developments are subject to robust and competent environmental assessment (including in the case of small-scale and microgeneration such as single turbines).

Genuinely sustainable renewables

We urge caution on unsustainable technologies that may fall under 'low carbon technologies' and caution against the facilitation of these. Instead, RP7 should focus on genuinely low carbon renewables that are sited, constructed and operated in harmony with nature and underpinned by robust and competent environmental assessment with appropriate stakeholder participation and engagement.

Rollout of EVs

⁹ <https://www.theccc.org.uk/publication/sixth-carbon-budget/>



Please refer to our comments within the RP7 consultation response from 2022.

Bird fouling

We understand the distress caused to NIE Networks' customers by extreme levels of bird fouling. As a bird conservation charity, we would need to receive further detail on this bird deterrent device. Until further details are provided, the following general advice should be followed:

- The operation of a deterrent must not trap, injure or kill a bird.
- A scaring device or barrier deterrent must not be set so that it prevents nesting birds access to their active nest.
- Scaring devices must not be used close to the nest of a Schedule One species, since any kind of disturbance of these birds at or close to their nest is strictly illegal.
- Before starting to deter birds from one site, make sure that there are alternatives for the birds to go to. Otherwise the deterrent will not have the desired effect and will simply serve to distress the birds.

The welfare of the birds must be considered when installing any bird deterrent. Consideration must also be given to the conservation status of the target bird species, even if they are not Schedule One species. For example, the starling (*Sturnus vulgaris*) is amber-listed in Ireland¹⁰ and red-listed in the UK¹¹ due to its population declines. Please note that DAERA (the Department for Agriculture, the Environment and Rural Affairs) is currently reviewing general licences in Northern Ireland¹². DAERA define general licences as permitting authorised persons to carry out actions that would otherwise be illegal. They cover certain types of activity relating to birds, such as preserving public health or air safety, and preventing the spread of disease. General licences avoid the need for people to apply for individual licences for these specific circumstances. General licences are still subject to strict conditions, and abuse of them or failure to comply with the conditions could constitute an offence.

RSPB NI would be happy to offer further advice when the details of the deterrent that NIE Networks plans to use has been clarified.

Environmental Action Plan

¹⁰ <https://birdwatchireland.ie/birds-of-conservation-concern-in-ireland/>

¹¹ <https://www.bto.org/our-science/publications/birds-conservation-concern/status-our-bird-populations-fifth-birds>

¹² [Wildlife licensing | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/wildlife-licensing)



In the absence of targets in law for nature's restoration, we welcome NIE's ambition to go beyond their minimum obligations with regards to nature and we look forward to seeing this ambition delivered on the ground.

We welcome the inclusion of a natural capital approach to quantify the importance of ecosystem services, which can often be difficult to calculate and therefore risk being excluded as a consideration within decision-making. We would advise the Utility Regulator and NIE Networks to review information and studies conducted by RSPB or partners on a natural capital approach¹³ within urban settings¹⁴, peatlands¹⁵ and nature-based solutions more widely¹⁶. Furthermore, work conducted by Derry City and Strabane District Council found that for every £1 invested in green and blue spaces, £22 in public benefits was delivered¹⁷.

Regarding 11.15, we note with concern the miscommunication at Orangefield which resulted in the felling of approximately 170 trees¹⁸, and while we note the replacement of these trees, we wish to emphasise that mature habitat is not easily replaced and its removal can have significant impacts on habitat integrity. NIE Networks should commit to no unnecessary tree removal (and any unavoidable hedgerow or tree removal shall occur outside of the standard bird breeding season, which typically runs from 01 March to 31 August to ensure compliance with The Wildlife (NI) Order 1985 (as amended)). Clear communication with contractors and other partners is vital in order to ensure that habitat is not damaged. We note that reference is made to offsetting impacts. When 'offsetting' environmental impacts, the mitigation hierarchy of 'avoid, minimise, mitigate' must be followed: where in the first instance, any impacts must be avoided, where this is not possible sufficient mitigation measures must be put in place.

Furthermore, we note the inclusion of the term 'rewilding' within 11.15. Rewilding is a broad term and can sometimes be conflated with land abandonment or undermanagement, both of which can be detrimental to species and semi-natural habitats. We would urge NIE Networks to seek professional advice on habitat creation

¹³ [accounting-for-nature.pdf \(nienvironmentlink.org\)](https://www.nienvironmentlink.org/accounting-for-nature.pdf)

¹⁴ [New research on need for urban green space | National Trust](#)

¹⁵ [Valuing Our Peatland - Environmental and societal benefits delivered through peatland restoration - Farming - Farming - The RSPB Community](#)

This work showed that for every £1 invested in our study site at Garron Plateau, it delivered £4 in public benefits.

¹⁶ [RSPB: Economic benefits of nature-based climate solutions - Cambridge Econometrics \(camecon.com\)](#)

¹⁷ [Natural Capital Account for Derry City and Strabane District - Carnegie UK Trust](#)

¹⁸ [Orangefield Park trees cut down by contractors are replaced - BBC News](#)



and management. For example, tree-planting in some areas can cause significant harm to species that rely on open habitats.

We are supportive of NIE's intention to report on its environmental actions and outcomes, including relating to biodiversity. We wish to repeat our comment from the RP7 consultation on ensuring that actions follow the SMART acronym to ensure that environmental action is meaningful and tangible. This means that objectives should be specific, measurable, achievable, relevant and time-bound. Many of the targets here would benefit from being more specific in terms of what they will achieve and by when. Actions should also be subject to mid term review.

We would be very supportive of the recommendation in 11.26 to require NIE to publicise an annual environmental report as a reputational incentive. This should be made publicly available. We also agree with the statement that NIE has the ability to deliver above and beyond what has currently been identified.

Lessons Learnt

We welcome statements 15.14-15.16 within lessons learnt.

Other comments

We would seek further clarity on the content of the further issues noted within 15.17 where the Utility Regulator states: "*As part of this RP7 draft determination we have identified some issues, which we consider to be beyond the scope of the RP7 price control determination. We would plan to continue work on these areas where appropriate and identify broadly the key issues for the RP7 final determination.*" Further detail on which issues this consists of would be appreciated.

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ENDS.



Appendix A

Northern Ireland Electricity Networks - A Future Network For All – NIE Networks RP7 Price Control - Consultation

A response from RSPB Northern Ireland, 9th November 2022

The RSPB is UK's lead organisation in the BirdLife International network of conservation bodies. The RSPB is Europe's largest voluntary nature conservation organisation with a membership over 1 million in the UK, supported by over 11,000 of which live in Northern Ireland. Staff in Northern Ireland work on a wide range of issues, from education and public awareness to agriculture and land use planning.

We believe that sustainability should be at the heart of decision-making. The RSPB's policy and advocacy work covers a wide range of issues including planning and regional policy, climate change, energy, marine issues, water, trade and agriculture. As well as commenting on national planning policy issues. The RSPB's professional conservation and planning specialists engage with over 1,000 cases each year throughout the UK, including development plans and individual planning applications and proposals. We thus have considerable planning experience. The RSPB also makes over 100 planning applications a year on its own reserves and estate.

The RSPB firmly believes that nature should be a key consideration in all decision-making. Electrical infrastructure has the potential to have a significant impact on nature. Where nature is considered early on in the decision-making process, the risk of conflict is

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reduced. Cases such as the Hintlesham Woods¹ SSSI (Site of Special Scientific Interest) in England illustrates the issues that can arise when nature was not considered at the early stages of planning new electrical infrastructure.

RSPB NI welcomes the opportunity to comment on the NIE Networks RP7 Price Control consultation. Please note that not all questions have been commented on. The numbering and sequencing of RSPB NI comments below follows that contained within the consultation document.

Response 1

The current strategy for RP7 lacks consideration for nature. Peer reviewed evidence on climate change² and biodiversity³ shows that the nature and climate emergencies are inextricably linked. Therefore, it is essential that we pursue an integrated and joined-up approach to tackling them together. They cannot be resolved in isolation or traded off against one another. 11% of species in NI are threatened with extinction⁴, with one quarter of our bird species being red-listed⁵. NI ranks 12th worst out of 240 countries for biodiversity loss⁶. 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. RSPB NI recognises that 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, in harmony with nature. The RP7 document lacks any discussion of how the construction of new infrastructure or the upgrading of new infrastructure will minimise its negative impact on nature.

There is also no mention of what, if any, environmental assessments have been undertaken as part of the plan process, or NIE plan to undertake. Ambition for reducing environmental harm should go beyond the objectives that NIE Networks have set for their organisation as part of their ISO 14001 Environmental Quality Standard.

Finally, there is no detail on how NIE Networks intend to monitor, measure and review the success of the proposals laid out in the RP7 plan.

¹ [Hintlesham Woods case](#)

² [IPCC](#)

³ [IPBES](#)

⁴ [State of Nature report 2019 – summary for NI](#)

⁵ [Birds of Conservation Concern Ireland](#)

⁶ [Biodiversity Intactness Index](#)

Response 2

Customers embracing more sustainable energy usage will be a key aspect of meeting climate targets. However, energy efficiency and reducing consumption where possible are also part of the solution. Whilst the responsibility for energy efficiency at a household level lies with the customer, there are measures that providers can take to support households in achieving energy efficiency. One route to incentivise and provide greater transparency is the national roll out of smart meters. These have been described by the Department for Business, Energy and Industrial Strategy (BEIS) as playing a “vital role in decarbonising the energy sector” and “delivering secure, cheap and clean energy”⁷.

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. Energy Efficiency is also 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 CCC⁸.

Response 3

The Climate Change Act (Northern Ireland) 2022⁹ states that “the Department for the Economy must ensure that at least 80% of electricity consumption is from renewable sources by 2030”. It also states that “the Department for the Economy must develop and publish sectoral plans for the energy sector”. The first Climate Action Plan and the first Carbon Budget are to be set next year. These, in addition to policies set by councils and by NIE Networks, must consistently advocate for renewables in harmony with nature. RSPB would also urge NIE Networks to engage with council’s biodiversity officers on ensuring that councils’ journeys to net zero do not worsen the nature crisis. The pathway to net zero should also incorporate energy efficiency.

Response 4

RSPB NI has no comment on this consultation question.

Response 5

⁷ [BEIS Smart Metering Implementation Programme, 2019 p5](#)

⁸ [UKCCC Sixth Carbon Budget](#)

⁹ [Climate Change Act \(Northern Ireland\) 2022](#)



RSPB NI has no comment on this consultation question.

Response 6

RSPB NI has no comment on this consultation question.

Response 7

RSPB NI has no comment on this consultation question.

Response 8

RSPB NI has no comment on this consultation question.

Response 9

RSPB NI has no comment on this consultation question.

Response 10

RSPB NI has no comment on this consultation question.

Response 11

RSPB NI has no comment on this consultation question.

Response 12

RSPB NI has no comment on this consultation question.

Response 13

RSPB NI has no comment on this consultation question.

Response 14

RSPB NI has no comment on this consultation question.

Response 15

RSPB NI has no comment on this consultation question.

Response 16

RSPB NI has no comment on this consultation question.

Response 17

RSPB NI has no comment on this consultation question.

Response 18



The consultation document refers to several adaptations that are proposed to make the network resilient to the effects of the climate crisis. One is enhancing the current vegetation management programme for the HV network and the introduction of a new programme for the LV network to reduce the impact of vegetation interfering with the network during storms. This vegetation management scheme must give due consideration to the impact that vegetation cutting can have on birds during the breeding season. Birds nesting in Northern Ireland are legally protected under the Wildlife (Northern Ireland) Order 1985 (as amended)¹⁰. Under this legislation, it is illegal to intentionally or recklessly take, damage or destroy an active nest or its contents. The RSPB recommends that people avoid hedge and tree cutting between 1 March and 31 August in order to prevent any potential impact on breeding birds. However, vegetation that is encroaching into a road or close to a powerline is considered an exception where there is an overriding safety concern that could not have been addressed at a more appropriate time of the year. We would urge NIE Networks to assess whether there is an overriding safety concern when carrying out vegetation management during the breeding season. NIE Networks should plan ahead to conduct necessary works where possible outside of the breeding season. All routine maintenance works should be scheduled in advance outwith the breeding season.

Response 19

RSPB NI has no comment on this consultation question.

Response 20

We understand the distress caused to NIE Networks' customers by extreme levels of bird fouling. As a bird conservation charity, we would need to receive further detail on this bird deterrent device. Until further details are provided, the following general advice should be followed:

- The operation of a deterrent must not trap, injure or kill a bird.
- A scaring device or barrier deterrent must not be set so that it prevents nesting birds access to their active nest.
- Scaring devices must not be used close to the nest of a Schedule One species, since any kind of disturbance of these birds at or close to their nest is strictly illegal.

¹⁰ [Wildlife \(Northern Ireland\) Order 1985](#)



- Before starting to deter birds from one site, make sure that there are alternatives for the birds to go to. Otherwise the deterrent will not have the desired effect and will simply serve to distress the birds.

The welfare of the birds must be considered when installing any bird deterrent. Consideration must also be given to the conservation status of the target bird species, even if they are not Schedule One species. For example, the starling (*Sturnus vulgaris*) is amber-listed in Ireland¹¹ and red-listed in the UK¹² due to its population declines. Please note that DAERA (the Department for Agriculture, the Environment and Rural Affairs) is currently reviewing general licences in Northern Ireland¹³. DAERA¹⁴ define general licences as permitting authorised persons to carry out actions that would otherwise be illegal. They cover certain types of activity relating to birds, such as preserving public health or air safety, and preventing the spread of disease. General licences avoid the need for people to apply for individual licences for these specific circumstances. General licences are still subject to strict conditions, and abuse of them or failure to comply with the conditions could constitute an offence.

RSPB NI would be happy to offer further advice when the details of the deterrent that NIE Networks plans to use has been clarified.

Response 21

RSPB NI has no comment on this consultation question.

Response 22

RSPB NI has no comment on this consultation question.

Response 23

Ranked priority of NIE Networks' Environmental Action Plan commitments:

1. Quantifying and improving biodiversity / Natural Capital.
2. Helping reduce the environmental impact of our supply chain.
3. Moving away from SF6 gas use.
4. Reducing our business carbon footprint
5. Quantifying and reducing embodied carbon footprint
6. Replacing worst performing fluid filled cables.

¹¹ [Birds of Conservation Concern Ireland report 2020-2026](#)

¹² [Birds of Conservation Concern 5 \(UK\)](#)

¹³ [Review of General Licences](#)

¹⁴ [Wildlife Licensing - DAERA](#)



7. Reducing fluid leaked from fluid filled cables.
8. Minimising waste to landfill.
9. Decarbonising our fleet.
10. Reducing network losses.

Comments

It is very difficult for us to rank the commitments from the Environmental Action Plan as RSPB NI are not fully briefed on the environmental impact of these commitments in an NIE Networks context. It is essential to prioritise action where there is the greatest threat to the environment and supplement this with environmental improvements.

The actions that NIE Networks commits to in its environmental plan should follow the SMART acronym to make sure that environmental action is meaningful and tangible. This means that objectives should be specific, measurable, achievable, relevant and time-bound. Many of the targets here would benefit from being more specific in terms of what they will achieve and by when.

RSPB NI urge NIE Networks to develop clear objectives and to prioritise the reduction of all negative environmental impacts in the next planning period, with particular focus on sensitive habitats and species. The ranked list above is a broad picture of which environmental commitments need particular attention, based on the limited information that we have been provided. Any prioritisation of environmental actions should be informed by robust, competent environmental assessment including Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Habitats Regulation Assessment (HRA) – where necessary and appropriate.

Quantifying and improving biodiversity/Natural Capital: The RP7 Environment Strategy has insufficient detail on quantifying and improving biodiversity/natural capital. What would that involve? RSPB NI believes that environmental sustainability goes beyond our carbon footprints and must also consider the nature crisis. 11% of species in NI are threatened with extinction¹⁵, with one quarter of our bird species being red-listed¹⁶. NI ranks 12th worst out of 240 countries for biodiversity loss¹⁷. All organisations with a physical footprint have a role to play in averting this crisis. NIE should aim to reduce its negative impact on nature, for example by avoiding the construction of new electrical

¹⁵ [State of Nature report 2019 – summary for NI](#)

¹⁶ [Birds of Conservation Concern Ireland](#)

¹⁷ [Biodiversity Intactness Index](#)



infrastructure on or near designated sites¹⁸ such SPAs (Special Protection Areas), SACs (Special Areas of Conservation), Ramsar wetland sites and ASSIs (Areas of Special Scientific Interest). NIE should follow the mitigation hierarchy by firstly avoiding sensitive areas such as the designated sites listed above or areas where priority species may be sensitive to disturbance, and then using appropriate scientifically proven mitigation measures to offset or reduce any impacts. NIE works should not result in the net loss of biodiversity and should contribute to a net gain. This could include greenfield sites, brownfield sites and the urban environment. Our partnership with Idverde¹⁹ (a company which offers a holistic range of services to support the creation, maintenance, and management of landscapes throughout the UK) offers an example of what integrating nature into an urban space can look like. We are working with them to help improve the understanding and role that community groups and residents can play in discovering and looking after the wildlife in their neighbourhood²⁰.

As previously mentioned, birds nesting in Northern Ireland are legally protected under the Wildlife (Northern Ireland) Order 1985 (as amended)²¹. Under this legislation, it is illegal to intentionally or recklessly take, damage or destroy an active nest or its contents. Therefore, vegetation management should be avoided between 1st March and 31st August unless there is an overriding safety concern that would make it dangerous to wait until after the bird breeding season is over. NIE Networks should also consider the undergrounding of cables in areas where bird species vulnerable to line strikes are found.

Helping reduce the environmental impact of our supply chain: Reducing environmental impact in the supply chain is welcomed. However, NIE Networks needs to be much more ambitious than just 'helping' to reduce the environmental impact in their supply chain. Tangible and measurable reductions of environmental impact are critical to allow nature's recovery. Refer to our comments above regarding the need for SMART priorities.

Moving away from SF6 gas use: Reducing our greenhouse gas emissions is an essential aspect of tackling the climate emergency. SF6 is a recognised contributor to global warming and its usage must be urgently reduced. The release of SF6 should be minimised as much as possible during the production, usage and decommissioning of

¹⁸ [Protected sites in Northern Ireland.](#)

¹⁹ [Idverde](#)

²⁰ [Local people, landscape specialists and conservationists creating better green spaces.](#)

²¹ [Wildlife \(Northern Ireland\) Order 1985](#)



equipment. As previously mentioned, targets should be SMART targets. Therefore, we would ask for a timeline of when SF6 gas usage will be reduced and by what extent.

Reducing our business carbon footprint: This is also welcomed. Carbon footprints should be reduced in real terms rather than predominantly relying on offsetting. The nature and climate emergency needs tackled urgently. Actions that NIE Networks takes to reduce their carbon footprint must be in harmony with nature.

Quantifying and reducing embodied carbon footprint: This holistic approach to reducing emissions is welcomed. The nature and climate emergency needs tackled urgently. Actions that NIE Networks takes to reduce their carbon footprint must be in harmony with nature.

Replacing worst performing fluid filled cables and reducing fluid leaked from fluid filled cables: Pollution is a major threat to priority species and habitats. The leakage of industrial fluids can have potentially devastating impacts on our wildlife. We welcome measures that will reduce the risk of pollution to the environment. We call for prioritising the most environmentally sensitive areas for the replacement of cables or the reduction in fluid leaked from these cables.

Minimising waste to landfill: reducing our waste that goes to landfill needs to be done urgently. This requires us to improve the efficiency of resource use and ensure that waste is valued as a resource. A more circular economy model will contribute to reduced dependency on importing raw materials and help the transition to more sustainable material management. Opting to reduce consumption, reuse items and equipment and recycle or upcycle items reduces our impact on the planet. This in turn facilitates the reduction in the quantity of new resources that we need to source, which in turn reduces the pressure on nature. For example, the International Resource Panel, part of the United Nations Environment Programme, found that natural resource extraction accounts for 90% of global biodiversity loss²². This means that it is more important than ever that we manage our resource use sustainably.

Decarbonising our fleet: We welcome the expansion of the use of electric vehicles where active travel and the use of public transport are not appropriate forms of travel. However, NIE Networks could be more ambitious here and aim for a 100% electric fleet by 2030 rather than 70%.

²² [UNEP report on Sustainable Trade in Resources: Global Material Flows, Circularity and Trade.](#)



Reducing network losses: Improved efficiency and reducing consumption where possible will be vital in reducing the environmental impact of the energy sector. See our response to question 2 for more on energy efficiency.

Response 24

RSPB NI has no comment on this consultation question.

Response 25

There is a growing acceptance that we need an energy system that delivers affordable energy, ensures security of supply and reduces emissions – the so-called “energy trilemma”. Tackling the climate crisis is urgent and needs investment now in order to build a more sustainable future. The move away from fossil fuels needs to start immediately, but the move towards renewable energy will not be truly sustainable unless it is done in harmony with nature. It is therefore essential that environmental sustainability in the energy trilemma encapsulates both low emissions and low ecological impact. To deliver a sustainable energy transition in harmony with nature, climate and nature must be at the heart of our economic Green Recovery and energy transition to build a just, sustainable and resilient future. Increased energy infrastructure and efficiency measures offer significant opportunities for new employment and training. Support for innovation and development in harmony with nature facilitate delivery of national objectives for emissions reduction and biodiversity and would build expertise that could be exported as other countries increasingly seek to decarbonise while restoring nature. The low carbon transition will present a plethora of job opportunities many areas, including the energy sector. At the same time, there will inevitably be job losses in other sectors related to the fossil fuel industry for example. Therefore, training and re-skilling will be essential to ensure that no community is disproportionately impacted and that job losses in any given sector are compensated for by emerging opportunities in new growth sectors.

Response 26

RSPB NI has no comment on this consultation question.

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