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Advice NI Response  
to  
Department for the  
Economy's  
Energy Strategy  
for Northern  
Ireland

August 2021

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# Advice NI Response to Department for the Economy's Energy Strategy for Northern Ireland August 2021

## Background

Advice NI is a membership organisation that exists to provide leadership, representation and support for independent advice organisations to facilitate the delivery of high quality, sustainable advice services. Advice NI exists to provide its members with the capacity and tools to ensure effective advice services delivery. This includes: advice and information management systems, funding and planning, quality assurance support, NVQs in advice and guidance, social policy co-ordination and ICT development.

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## Question Responses

Q1: Do you agree with the overall goal of achieving net zero carbon energy no later than 2050?

Yes. Although there are limitations with delivering on this Strategy in isolation from other Departments and in the absence of a comprehensive Decarbonisation Plan for NI. We will struggle to meet targets or achieve decarbonisation in time if we do not have a pan-Department Decarbonisation Plan.

Q2: Do you agree with the proposed vision of “net zero carbon and affordable energy” for the Energy Strategy?

In general, but again, in the absence of a comprehensive Decarbonisation Plan the vision will have a limited reach.

Q3: Do the five principles identified provide clear direction around the approach that we want to take with the Energy Strategy?

We have provided comments on the five principles here:

***Placing you at heart of our energy future:***

If people are to be placed at the heart of this Strategy, it is key that the transition to low-carbon energy is a just transition, and it is important that this language is explicitly used throughout the Strategy. Currently, transition is used, but not a just transition. A just transition will ensure that fuel poverty is factored into every action and mean that the most disadvantaged customers are made central to the Strategy.

A more decentralised and distributed energy system is necessary is we are to make the transition to low-carbon energy. And core to such a system is the prosumer i.e. that we will become not just consumers of energy but producers of energy too. The prosumer should therefore be at the heart of the Strategy. However, there is no mention of prosumers and in fact, people are given a very passive role as simply consumers.

***Do more with less:***

While 'do more with less' is exactly what needs to happen, and while energy efficiency and putting in place measures to use less energy are both important in achieving that, the Strategy again stops short of using more direct language. This principle should be titled 'reducing energy consumption'. Reducing energy consumption is accepted as a key component of any energy decarbonisation strategy. We have to face facts. We are consuming too much energy and no matter how efficient we become in our energy use, it will not reduce the level of consumption far enough. We may even have to consider rationing energy use.

We might also want to expand what is meant by the 'energy industry'. If we become prosumers, if energy is more distributed and micro-generated, communities have the potential to take charge of their own energy generation, maybe with assistance from industry or maybe not. In this way, we all become part of the energy industry.

***Grow a green economy:***

The just transition provides a unique opportunity for developing our economy into one that is low-carbon, democratic and resilient. Our current economic system is based on continuous growth, pursuit of profits, over-consumption and waste, globalisation and excessive international trading, all of which have brought about over-dependence on external forces and investment and climate and environmental crises. Economic growth is in direct conflict with achieving a decarbonised energy system and society.

A change of language / paradigm is required where we no longer talk about growth. Instead, economic development should take centre stage and as part of that, we develop and nurture sectors that allow us to provide for more of our own needs so that we can become more resilient and self-reliant. So, yes, we want to see the 'development' of a green sector, but not growth in the conventional sense.

There is an assumption in this Strategy that the gas industry will be central to our green economy. But reasons are provided elsewhere in this response showing why this assumption need not be correct.

***Replace fossil fuels with renewables:***

Replacing fossil fuels with renewable energy sources is key to any strategy to decarbonise energy. Unfortunately, the focus in this Strategy is on the gas network and using renewable sources to fill the gaps where the gas network does not reach. That focus limits our options and ties us to a carbon-based energy for some time to come and risks us diverting our limited resources into what is really only a temporary solution, at best.

We need to have a much more ambitious plan for adopting indigenous renewable sources, using a cocktail of these sources alongside reduction of energy consumption in to provide for our energy needs and a low-carbon society.

Promoting EVs is important and necessary, both in public and private transport, but so too are strategies for reducing the amount of travelling we do. For example, improving public transport, promoting cycling and allowing more options for working from home, online meetings and events, etc., would have to be part of the mix of travel options.

***Create a flexible integrated system:***

All five principles will require a complete rethink of our current centralised energy system and the approach taken now should prepare the way for a more distributed system, one that allows more micro-energy generation and more prosumers. The gas network that is promoted so heavily throughout this Strategy is an example of a centralised solution that still clings to the carbon-centric system. At best, it is only ever going to be a temporary fix, even the renewable hydrogen option, and it risks becoming obsolete far too soon. We need to be smart about how and where we invest our limited resources which means by-passing options such as the gas network and instead focusing on electrification and diverse options that will help create the distributed system of prosumers that is required.

There is a need to be mindful that solutions can often be low-tech and inexpensive, that they do not always have to go down the high-tech expensive route. Many of the high-tech solutions are promoted by industry lobbyists whose primary goal is making profit for their company, and not a just transition.

We must be careful not to label waste as a renewable energy. Incineration and large-scale gasification seem like neat solutions to our energy and waste problems but they lead to further problems and deal with symptoms rather than root causes. Reducing waste, as well as Repair and Reuse are preferable to conversation of waste into renewable energy. After and only after waste is processed through the three R's, should there be consideration given to treating the residual waste, such as organic and animal waste, as a source of renewable energy. And even then, more environmentally-sound methods, like small-scale anaerobic

digestion or composting, should be used to generate the energy. There are biomass options that are renewable and sustainable and which could simultaneously contribute to the development of the green economy.

If customers are to become prosumers and if the transition is to be just, then financial support must be substantial, not piecemeal. If energy grants were available that covered the full costs of necessary energy measures, that would make the transition fair and affordable. Funding is discussed elsewhere in this response.

**Q4: Are there any key delivery priorities for the Energy Strategy not captured? If so, please outline what you believe should be included.**

The Strategy should have additional delivery priorities around prosumers, decentralised energy generation and community-owned energy projects. The green economy can be built around these priorities to ensure that the positive impact of new, skilled jobs actually reaches those most disadvantaged and ensuring that the transition is just.

**Q5 Do our proposed indicators adequately allow us to measure success at achieving the proposed Energy Strategy outcome? If not, please advise on what alternative metrics should be used.**

- a. Carbon emissions from energy-related sectors
- b. Jobs and turnover in the low carbon and renewable energy economy
- c. Domestic energy costs relative to household income
- d. Business energy purchases relative to business turnover
- e. Households in fuel poverty
- f. Relative electricity & gas prices

The aviation and farming industries should be given special and individual mention in this list as their contribution to carbon emissions and climate change is substantial. No strategy for energy decarbonisation can ignore these massively contributing factors.

**Q6. Do you think there are significantly different illustrative scenarios which should be developed? If so, please provide further information.**

The scenarios provided are reasonable. Obviously, Scenario 1: Business as Usual, is not an option. Scenario 3: High Gasification, is not an option either. This is discussed multiple times elsewhere in this response but briefly, gas provides a temporary fix at best and will require huge investment from government if scenario 3 is followed. It is dismaying to see how strongly the gas solution features in this Strategy.

A potential option is Scenario 2: High Electrification although the danger here is that fossil fuels continue to be used to generate much of the electricity. This scenario would require renewable sources of energy for energy generation which begins to make this scenario look more like Scenario 4: Diverse.

The only scenario that provides us with any real chance of decarbonising our energy system is Scenario 4: Diverse. It is this scenario that we must pursue and divert resources towards. In the Diverse scenario, there is still scope to use the gas network, albeit as a short-term measure.

Scenario 4 should also include wave energy and even micro-hydro. According to the European Marine Energy Centre in the Orkney Islands, the north and west coasts of Ireland are home to the biggest wave resources in Europe. Micro-hydro, in the form of water wheels, has been used since ancient times and modern turbines have potential that is being left unused. But to be complete, Scenario 4 must include ‘reduction in energy consumption’ as an assumption in its own right, not as a by-product of other assumptions as it is currently. It will require measures such as energy rationing or quotas, for example.

Q7: Do you agree with the four consumer population groups we have identified? Please advise on key considerations within each.

- a) Domestic vulnerable consumers
- b) Other domestic consumers
- c) Small businesses
- d) Larger businesses

Given the contribution they make to carbon emissions and climate change, both the farming and aviation sectors should be added to this list.

Q9: Do you agree with the proposed scope of the “one stop shop”? Please advise on any different activities you think should be included.

We agree with the proposed scope for the ‘one stop shop’.

Q12: Do you agree with the four identified priority clean energy sectors:

- a) Energy efficiency
- b) Renewable energy
- c) Hydrogen economy
- d) Circular economy

Please advise on any additional areas that you believe should be prioritised and your reasons for this.

We do not agree with priority c) and recommend removing hydrogen economy from the list. Throughout this Strategy, hydrogen is presented as the panacea to our energy problems. If it has a role to play, it is a very small one. Yet, putting more money into the gas network to allow it to pipe hydrogen instead of gas, is probably not the best way to spend public money or reach climate targets. The risk is that by pursuing this option, we will spend too much of our limited resources on this option, leaving fewer resources for other genuinely renewable options. Friends of the Earth, for example, recommend that renewable electricity, not hydrogen, is promoted<sup>1</sup>.

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<sup>1</sup> <https://policy.friendsoftheearth.uk/insight/role-hydrogen-our-low-carbon-transition>

Using the term 'clean energy' opens up the possibility of using non-renewable and/or carbon-intensive sources to generate energy, for example, non-renewable hydrogen gas, incineration and gasification of waste. This term should be replaced with 'renewable energy' so that there is no room for ambiguity.

Q13: Do you agree with the economic growth opportunities identified within energy efficiency? What supporting policies do you believe are needed to take advantage of these?

Q14: Do you agree with the economic growth opportunities identified within renewable energy? What supporting policies do you believe are needed to take advantage of these?

Q15: Do you agree with the economic growth opportunities identified for hydrogen production, demand and manufacturing within the hydrogen economy? What supporting policies do you believe are needed to take advantage of these?

Q16: Do you agree with underpinning principles identified within the circular economy? What supporting policies do you believe are needed to take advantage of the potential economic opportunities?

This Strategy places a heavy emphasis on hydrogen as a long-term solution but that is not something we agree with and we do not agree with economic opportunities identified through a hydrogen economy. Our limited resources would be best invested in genuine renewable alternatives, even renewable biogas.

We agree with the economic development opportunities for energy efficiency, renewable energy and the circular economy. However, we believe more opportunities are possible in which communities are empowered and enabled to become active rather passive in the just transition. There is a risk that our green economy will involve big industry players who will focus on profit extraction and promote the expensive, high-tech solutions every time.

The underpinning principles of the circular economy are a helpful way to think about the form that the green economy could take. The circular economy fits under the umbrella of Community Wealth Building and the list of economic opportunities below are examples of circular economy principles.

We should make our green economy one that is about local economic development that enriches quality of life and grows indigenous businesses, including co-operatives and social enterprises. Building a green economy for energy efficiency and renewable energy generation offers endless economic opportunities and if we were to systemically apply the Community Wealth Building model to identify and develop those opportunities, we would ensure this new economy would be just, resilient and democratic.

Some examples of possible economic opportunities within Community Wealth Building that could help create the new green economy include:

- Using wool from locally reared sheep to manufacture sheep's wool insulation for insulating buildings (jobs would be created in the manufacture of the insulation and low-carbon materials would be used to insulate homes).

- Using locally grown willow coppice to manufacture wood chips for biomass boilers (jobs would be created in the manufacture of the chips and a renewable energy would be used to heat homes).
- Using locally grown kelp to provide with raw materials for renewable biofuel and natural fertiliser (jobs would be created in the growth and manufacture of kelp biofuel and fertiliser; at the same time, the kelp would deacidify our sea water, our farmers could move away from artificial fertilisers, and there would be a renewable energy to heat homes).
- Using locally manufactured wave turbines to generate renewable energy (jobs would be created in the manufacture of the wave turbines and in the installation of the turbines, while communities could set up renewable energy co-operatives to avail of the energy generated and to make some money if any energy is sold to the grid).
- Using sawdust and thinnings from the forestry sector to manufacture wood chips for biomass boilers (jobs would be created in the manufacture of the chips and a renewable energy would be used to heat homes).

Q19: Do you agree with a focus on research mapping, research funding, business linkages and UK opportunity scanning to maximise the impact of the local research base with clean energy specialisms? Please identify specific opportunities in the local research base that could be progressed.

We do not entirely agree, and we believe that the focus should be on local economic development through Community Wealth Building, as discussed previously.

Q20: Do you believe that utilising and tailoring existing education and training routes can meet the short-term skills needs of the clean energy sector? How can activities within these routes be shaped to meet the needs of the sector?

Q21: Do you agree with the proposal to establish an Energy Skills Forum to shape the future skills needs of clean energy sector? If so, what do you believe the role, remit and membership of such a group should be?

It is always a danger, and a little myopic too, to allow private industry to dominate and dictate the content of education and training. However, we do need education and training content to reflect the needs of the new green economy. If we agree that local economic development, under the umbrella of Community Wealth Building, is the model we use, then our education and skills content can be developed around that. This is something that can be turned around very quickly. In this way, the resources needed to tailor education and training will be used for the public good and not for the good of a small group of private interests. If there is to be an Energy Skills Forum, the energy industry should not dominate. We live in a democracy and Forum such as this should reflect that. Community energy and economy representatives such as NI Community Energy, Drumlin Wind Energy, Co-operative Alternatives, Social Enterprises NI, etc. should be members, as well as the Fuel Poverty Coalition.

Q22: Do you believe that there is a need for specific measures aimed at ensuring a just transition in Northern Ireland? If so, please advise on what the focus of these should be in addition to the education and training routes already proposed for a low carbon workforce.

A just transition will only happen if it is designed into the transition from the start. If we ensure that job opportunities are fair and that the green economy in general is focused on communities rather than industries driven by profit alone, then there is a chance of a just transition. This is why using a model such as Community Wealth Building is crucial if we are to achieve a just transition.

Q23: Do you agree that an energy savings target should be set for Northern Ireland?

Yes, and that target should be ambitious, in line with the urgency required to decarbonise, as well as considering how a reduction in energy consumption can be achieved.

Q28: Do you agree that we should ring-fence the PSO funding for vulnerable consumers including the fuel poor? Please advise on changes you believe should be made to the level and scope of the PSO for energy efficiency.

Yes, we agree with this.

Q29: Do you believe that green private finance solutions have a role to play in supporting domestic consumers to invest in energy efficiency? If so, what specific green finance solutions should be explored?

Q31: Do you believe that green private finance solutions have a role to play in supporting non-domestic consumers to invest in energy efficiency? If so, what specific green finance solutions should be explored?

Care must be taken that green private finance solutions are genuine investments and not simply a greenwashing exercise by the finance sector. Suggested financial options are discussed elsewhere in this response.

Q34: What measures do you think can have the most impact to support people to reduce the miles they travel in private vehicles? Please explain your rationale.

As the COVID lockdown has shown, it is possible to work from home and host meetings and gatherings online. For many jobs, there is no need to travel to and from an office every day or to physically attend meetings and events. Many gatherings can be moved online. Conducting training and education courses remotely is entirely feasible. Supporting this to continue would be a useful way of reducing travel.

In addition, more walking and cycling through promoting Active Travel, and improvement to public transport are other means of reducing travel in private vehicles.

Q35: Do you agree with setting a 70% renewable electricity target by 2030, whilst retaining the flexibility to increase this to 80%?

Yes, although the flexibility should allow the percentage to increase to 100%.

Q37: Do you agree that we should explore with BEIS the possibility of extending the Contracts for Difference scheme to Northern Ireland? If so, what terms would be needed to ensure generation in the region whilst protecting consumers?

Yes, but to protect consumers, the scheme would need to expand to include community-owned energy projects and the prosumer.

Q38: Do you believe it is possible that an offshore wind project in Northern Ireland could be operational before 2030? If so, please outline what targeted actions could be taken to deliver this.

Q39: Do you believe that a fixed platform offshore wind project should be targeted to be part of the renewable generation mix? If so, how would you propose some of the challenges associated could be overcome?

Q40: Do you believe that floating platform offshore wind offers the best long-term opportunities for offshore wind in Northern Ireland's waters? If so, what additional steps could be taken to encourage these projects?

Off-shore wind has great potential in the just transition and is worth pursuing. It needs to happen in partnership with communities and in ways that co-operatives and value-adding new jobs are created.

Q41: Do you believe that other marine renewables can play a key role in our renewable generation mix? If so, please identify what technologies offer the greatest potential and what steps can be taken to support these.

Wave energy and marine permaculture are other marine renewables that offer potential. We have the best wave energy resource in Europe and we are not taking advantage of that. Marine permaculture, such as kelp, can be a source of renewable biomass, and involves low-tech and relatively low-cost methods. Again, pursuing these energy sources should happen in partnership with communities and in ways that co-operatives and value-adding new jobs are created.

Q42: Do you agree that a strategic approach to planning the location of renewable projects should be taken? If so, please outline practical steps that could be taken to deliver this.

Practical steps in planning the location of renewable projects must be taken in conjunction with communities and not by industry 'experts' who are divorced from the implications of their decisions. Renewable projects should be community projects that operate in partnership with people and that create co-operative and job opportunities.

Q43: Do you believe that there should be a requirement for renewable developers to share some of the financial benefits of developments with local communities? If so, what share do you think would be reasonable? If not, please provide your rationale.

This question assumes that the energy industry will be responsible for and own renewable projects, and that communities should negotiate a little share of the financial benefits. This is the wrong assumption. While the private sector has a role to play in providing expertise, it should not own renewable energy projects outright because energy is too intrinsic in managing climate change that we can no longer leave it in the hands of private interests.

Instead, we should assume that renewable projects are community-owned, or at least co-owned in partnership with private firms. We should also assume that everybody is a prosumer (or has the potential to be) and therefore there will be less of a distinction between industry 'experts' and the rest of the population.

Q44: Do you agree with taking separate approaches to on-gas grid and off-gas grid consumers? If not, what approach should be taken?

Yes, and it is probably best not to pursue a strategy of expanding the gas network any further given that this energy source is a temporary solution at best.

Q45: Do you agree that we should not rule out potential low and zero carbon heat solutions at this stage? If not, please outline your rationale.

Q46: What low and zero carbon heat solutions do you believe we should prioritise for trials? Please identify where such trials should be focused and what key issues should be tested within each.

Q48: Do you agree that Northern Ireland should develop a pilot grant scheme to support low carbon heat technologies for domestic and small non-domestic consumers? If so, please identify key issues that need to be considered in designing and delivering such a scheme.

We should not rule out potential low- and net-zero carbon heat solutions, so long as they are indeed low- and net-zero carbon and so as long as we guard against spending our resources on promoting industry interests.

NI has great potential for generating heat energy from biomass sources. However, the emphasis must be on *sustainable* biomass such wood from managed woodlands or waste wood products, from willow coppice or kelp, etc., as not all biomass energy sources are low or zero carbon e.g. waste-to-energy approaches which burn or heat waste in incinerators or gasification plants would be no better than burning fossil fuels. District heating systems using renewable biomass are also worth considering as a pilot scheme.

The Forestry Service could play a role in developing a sustainable biomass economic sector, one that doesn't displace natural habitats or land required for food production, that replenishes rather than depletes forestry. They could also support or incentivise more production of energy crops like short rotation coppice, miscanthus or hemp for biomass. There is potential to establish a State-owned Sustainable Biomass Enterprise in conjunction with local worker-owned biomass cooperatives that together could operate across NI through the Forestry Service. These could manufacture sustainable wood chips from wood thinning, rotation and replanting of forests, forest residues and forest products.

Q49: Do you agree that legislative and regulatory steps should be taken to facilitate biomethane injection into the gas network?

Q50: Do you believe that support should be provided to encourage biomethane production for injection into the gas network? If not, please outline what alternative approach should be taken to decarbonising the gas network.

Q51: Do you agree that the local Gas Network Operators should develop and publish a plan to decarbonise gas out to 2050? If so, what key issues must be considered within it?

We do not agree that legislative or other support should be put in place to promote biomethane production. The gas industry has already received significant investment from Stormont for the existing network. If they wish to invest in biomethane production or publish a plan to decarbonise gas, they can do so but it should not be at the expense of the public purse. As stated elsewhere in this response, gas is a temporary decarbonisation solution at best and our limited resources should not be invested in such a short-term solution. It is time that other solutions are given investment and if legislative and regulatory steps are to be taken, it should be to assist those other solutions. If the energy scenarios of electrification and diversity are pursued instead, it is there that the resources and the legislative support should go.

Q63: Do you believe that Compressed Natural Gas, Liquid Natural Gas and/or synthetic fuels can play a role as an interim measure to decarbonising transport? If so, how can government help to encourage the private sector to trial and use these fuels?

The role of these measures is limited even in the interim. Stormont has already put a lot of public money into gas infrastructure but that investment has reaped profits for private interests. It is time to stop putting our scarce finance into these projects and instead divert it towards community- and public-owned projects.

Q64: Do you believe that CCUS can play a role in Northern Ireland? If so, what potential applications could be the initial focus for demonstration projects?

CCUS is another example of a high-tech solution that puts money in private pockets. In theory, CCUS sounds promising. However, the practical realisation of the technology has been limited and there is no guarantee it will work or become commercially viable in time to have a significant impact on the reduction of CO<sub>2</sub> emissions. There is uncertainty about the safety of underground storage and the impact it could have on groundwater, or about the potential leakage of the stored gas. Furthermore, CCS cannot capture and store the emissions from small, distributed sources, for example vehicles, and this is another drawback. Because of the high costs, CCS technology has to be heavily subsidised—the best-known application at the Boundary Dam in Canada was subsidised to the tune of \$240 million. Scottish Power cancelled their demonstration plant because of escalating costs.

Natural forms of carbon sequestration have much more potential. They would be less of an investment risk too, as they are relatively low cost, can be applied quickly, and can start to have an impact immediately, without the need for expensive technology or to wait for big

infrastructural projects to complete. For example, kelp which has been mentioned elsewhere, is a natural sink for carbon. Regenerative agriculture is another natural form of carbon sequestration. Farmers could be given incentives to practice regenerative farming, and likewise fishermen could be given incentives for kelp farming.

**Q65: Do you believe that our approach to petroleum licensing should change in line with our commitment to decarbonise energy?**

If we want to change the approach to petroleum licensing to be in line with the commitment to decarbonise energy, then the answer is simple: there should be a complete ban, written into legislation, on the issuing of licences for oil and gas exploration of any kind, including for unconventional shale gas exploration.

**Q74: Do you believe that financial support should be provided for micro-generation to increase the number of active consumers in Northern Ireland? If so, what should this support look like? If not, what are the alternatives?**

Micro-generation and prosumers will become the norm in our future energy system. The energy industry has a role to play because it has expertise and skills that are needed but their role should be one of assisting rather than being owners of the energy system. The one-stop shop will help support customers to become prosumers and to transition to a decarbonised society. But substantial financial support will also be necessary. These changes will require new revenue streams that could be funnelled into a Just Transition Fund. We make some suggestions for the Just Transition Fund here.

Community Wealth Building could be used to generate revenue as inherent in its purpose is ensuring that wealth is retained in the local region. Having our own regional, mutual bank would also be a means of financing the just energy transition and there already is a campaign in NI to establish such a bank.

NISEP should remain in place but the one-year investment cycle should be reconsidered, and more of its capital should be directed towards the higher level interventions. Alternative finance schemes, other than conventional grant schemes, could be tried as a way to source capital for more consumers. Examples include low-interest loans; rates or stamp duty incentives; a salary sacrifice scheme that allows employees to draw a loan through their employer to pay for energy improvements but that is repaid from their gross salary.

A Green Bond could be issued by Stormont, and the money directed towards ecological projects only.

Launch an awareness raising campaign with pension fund investors to have them acknowledge the threat posed by climate change and how that would impact on their ability to pay out future pensions;

The Green New Deal Group in England proposes several suggestions for generating revenue to meet the costs of decarbonising energy including Green Quantitative Easing and recouping some of the £80bn lost to tax avoidance and evasion annually. While these suggestions would have to be implemented from Westminster, and are not within the gift of Stormont, we could join with like-minded others in a campaign to demand that they are put in place. Another Westminster-controlled suggestion is the redirection of government subsidies to the fossil fuel industry and into the renewable energy sector instead.

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