



Comments from Imtac about the consultation on the establishment of a Just Transition Commission

(January 2025)

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About Imtac

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including carers and key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

The aim of Imtac is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (herein after referred to as the Department).

Introduction

Imtac welcomes the opportunity to comment on the current consultation. Climate breakdown and how, as society, we respond to it is the greatest challenge of our times. It is essential that transition to Net Zero is implemented in a way that is just and fair. Given the importance of the issue Imtac is disappointed that the Department has chosen such a short consultation process, truncated further by consulting during the Christmas holiday period. Allowing adequate time for consultation is an important part of effective policy development. As a small organisation with limited resources, shortened consultation processes limits our ability to respond in detail. The Committee, therefore, recommends that DAERA allow at least 12 weeks for future consultation processes.

Deaf, disabled and older people are amongst the groups in society most impacted by climate breakdown and the response to it. This has been highlighted on a global level by the United Nations with evidence showing that both disabled people and older people¹² are amongst those in society most affected and least likely to be equipped to deal with the impacts of climate breakdown related events and developments.

In addition to being impacted by climate breakdown related events there is evidence³ that both disabled people and older people are more likely

¹ <https://www.ohchr.org/en/climate-change/impact-climate-change-rights-persons-disabilities>

² <https://www.ohchr.org/en/climate-change/impact-climate-change-rights-older-persons>

³ <https://www.disabilitynewsservice.com/urgent-action-needed-to-ensure-disabled-people-are-not-neglected-in-climate-battle/>

to be excluded by Governments and others when it comes to developing solutions to combat climate breakdown and live more sustainably. This can be illustrated by simple everyday changes such as the decision to end the use of plastic straws. A further illustration is the widespread inaccessibility of electric vehicle charging infrastructure. Both examples highlight that disabled and older people are often left out of discussion and decision making about how we respond to climate breakdown and policies such as the transition to Net Zero.

In our paper *New Approach*⁴, Imtac has argued that a transition to Net Zero is both an opportunity and a threat to Deaf, disabled and older people. There is the opportunity to radically rethink and redesign the way we currently live, removing many of the barriers that exclude disabled and older people. At the same time there is the threat that if the requirements of disabled people and older people are not considered, the response to climate breakdown will make lives more difficult and increase existing inequalities. *New Approach* sets out four principles to ensure that we maximise the opportunities presented by the transition to Net Zero. The first and primary principle is that Deaf, disabled and older people are fully involved in decision making.

Comments on proposals for the establishment of the Just Transition Commission

Imtac supports the principles of just transition and the rationale outlined in the policy proposals in the consultation document for the establishment of a Just Transition Commission. We endorse the recognition in the objectives for the Commission that we need to ensure that the transition to Net Zero is just and fair.

We welcome the recognition that transition to Net Zero, and the work of the Commission, needs to consider people most affected by climate breakdown, least equipped to deal with climate breakdown and people who have done least to cause climate breakdown. We also welcome the particular focus for the Commission on reducing poverty, inequality and social deprivation.

As we have previously indicated Deaf, disabled people and older people are amongst those most impacted by issues directly related to just

⁴ <https://www.imtac.org.uk/new-approach-travel-our-streets-and-our-places>

transition generally and the proposed remit and work of the Commission. It is of concern to Imtac that the specific impact on Deaf, disabled people and older people is not acknowledged anywhere in the consultation. We are particularly concerned that the proposed membership of the Commission (as set out by the legislation) does not explicitly include people most impacted by climate breakdown, including Deaf, disabled and older people. This is a major omission. All guidance, from the United Nations to our own, makes clear that a just transition is impossible without the direct involvement of all the groups in society most affected by Climate Breakdown.

To be clear it is not acceptable to the Committee for the Commission to be given responsibility to simply engage with people most impacted by climate breakdown. It is important that the Commission engages with a range of organisations such as the Equality Commission and the Human Rights Commission which play a role in protecting and promoting the rights of people affected by climate breakdown. However, the Committee is clear these links should not be instead of direct participation of those most impacted by Climate breakdown in the work of the Commission through its membership. It is our experience, and the broader experience of most Deaf, disabled and older people, that without the direct participation of those impacted, issues will be routinely missed or ignored.

Imtac notes that Department has indicated that it is possible and will be desirable to extent the membership of the Commission beyond the Groups defined by the legislation. The Committee would suggest it is not just desirable it is essential that the membership of the Commission is broadened to include the voices of those most impacted by climate breakdown if it is to meet its overriding objective of ensuring a just transition to Net Zero.

Our principal recommendation is that the Department explicitly requires representatives of those groups most impacted by climate breakdown and transition to Net Zero to be included in the membership of the Commission. Explicit mention should be made of disabled people and older people under this requirement.

Given our calls for a broader membership, we do not support the proposal from the Department to limit the membership to a maximum of 14 people. We do however support the proposal to limit the total membership to a maximum of 20 people. The Committee believes that

this limit allows the Commission to be broadly representative whilst remaining effective.

Our second recommendation is that the Commission should have a membership of between 14 and 20 in order to be fully representative of all sectors and interests of our society.

The Committee has no further recommendations on the proposals in the consultation. We note the proposal to looking closely at and potentially mirroring the Scottish model which we would generally support but in the context of our recommendations. The Committee also notes that the powers of the Commission will be purely advisory. With no powers of enforcement and with Departments only required to have regard to the advice of the Commission, the responsibility for delivering a truly just transition that protects society from the worst impacts of climate breakdown, will and should be the responsibility of Ministers and the Assembly.

Conclusion

Intac supports the principles of just transition and the proposed establishment of the Just Transition Commission. The Committee does not, however, believe the current proposals for membership of the Commission adequately includes representation from people most impacted by climate breakdown and the response to it, which is essential, in our opinion, to the success of any Commission. We recommend that the final proposals for the establishment of the Commission include these groups and specifically include representation from Deaf, disabled and older people. The Committee would welcome the opportunity discuss how this can be achieved with officials from the Department.