



**Friends of
the Earth**

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**Response to Public Consultation on Carbon Budgets
Department of Environment, Climate and Communications**

08 February 2022

Introduction

1. Friends of the Earth Ireland is a community at the heart of the growing movement for a just world with zero pollution. We are part of the world's largest grassroots environmental network. We campaign and build movement power to bring about system change that is needed for a just world where people and nature thrive. We promote education and action for environmental sustainability and justice, and focus on Ireland's response to the big environmental challenges of our time, including the climate emergency and the achievement of the Sustainable Development Goals. We support people and groups working autonomously to connect their local work to the bigger national and international picture. We have particular experience in participatory education, campaign strategy, shaping public debate and driving policy change.
2. Friends of the Earth welcomes the opportunity to respond to the carbon budgets proposed by the Climate Change Advisory Council (CCAC) and sent by Government to the Oireachtas for consideration.

Priority recommendations

On the proposed figures for the first, second and third carbon budgets:

- **We are of the view that the Climate Change Advisory Council proposal on the size of the first and second carbon budgets (to 2030) should be recommended for adoption to both Houses of the Oireachtas.** We note that the annualized rate of emissions reduction in the first carbon budget to 2025 is lower than the annualized rate in the second budget period to 2030, i.e. that there is a degree of backloading as it is called. We would prefer if the gap between the two rates was smaller, but we accept it reflects the fact that new policies, even when adopted and implemented quickly, take time to have an impact on emissions. We are of the view, however, that there is **no room whatsoever for any additional backloading of emissions reductions, so it is imperative that the Government does not overshoot the first carbon budget.** Delaying emissions reductions means that we increase CO₂ accumulation in the atmosphere which directly increases the risk that we pass the threshold of key tipping points and trigger large-scale changes in Earth's systems.
- We do not think the third carbon budget is underpinned by sufficient analysis and research to meet the legal requirement under the Climate Act for the Climate Council to consider climate justice in proposing the carbon budgets (Section 6A[9][b] Climate Action and Low Carbon Development [Amendment] Act 2021). As this budget is provisional **we urge the Minister to formally request the Council undertakes further research and analysis on Ireland's fair share of the remaining global carbon budget prior to making its formal proposal on the binding limits for the 2031-2035 carbon budget**, and that this request is noted in any motion to approve the Carbon Budget Programme (of all three budgets) by the Dáil and the Seanad.

On the implementation of the carbon budgets and related matters:

- Ensure that **each sector of the Irish economy does their fair share to reduce its emissions** to meet the 2030 target. This is especially important given that we will only **achieve the 51% emission reduction target for 2030 if each sector achieves reductions at the very top of the indicative ranges published in the 2021 Climate Action Plan.**
- Safeguard **adherence to carbon budgets** by ensuring that planning and resources dedicated to carbon budget implementation is increased through all Departments and public bodies.
- Calculation of the carbon budgets **should not incorporate assumptions related to future technologies or innovations that are hypothetical or unproven.**
- *Prioritise a **Just Transition** where there is social investment to protect the vulnerable, and a process of participative and inclusive social dialogue with stakeholders from all sectors including communities and workers.*
- **Set up the Just Transition Commission on a non-statutory basis now**, while expediting the passage of the legislation to put it on a statutory basis by Q1 2023 at the latest, and **integrate Just Transition considerations in the annual Climate Action Plan and National Dialogue on Climate Action.**
- Increase the commitment to **climate finance from €225m a year by 2025 to €500m**, and prioritise the development of the **Climate Finance Roadmap** and **Climate Diplomacy Strategy** which are due by the end of Q2 2022.
- Expedite the **adoption of a roadmap at Government level to begin phasing out fossil fuel subsidies** (currently planned for Q1 2024). We support the Carbon Budget Committee’s recommendation in their Report that this “roadmap” should be published in 2022, with steps taken in 2023.¹ This should reflect social justice considerations with funds redirected into climate action and just transition.
- Given that the first two carbon budgets still do not amount to our fair share under the Paris Agreement, **any undershoot in the emissions outcome for the first budget period should not be carried forward to increase the second budget.**

Discussion on the context and basis for these recommendations:

Paris Agreement and Ireland’s fair share

Ireland has a responsibility to do its fair share of the global effort to meet the goals of the Paris Agreement, specifically limiting temperature increase to “*well below 2°C above pre-industrial levels and to pursue efforts to limit warming to 1.5°C*”.² We are not asking Ireland

¹ Joint Committee on Environment and Climate Action, Report on the proposed carbon budgets (Feb. 2022. Available at: https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_environment_and_climate_action/reports/2022/2022-02-07_report-on-the-proposed-carbon-budgets_en.pdf

² IPCC, 2018: Summary for Policymakers. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty [Masson-Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield (eds.)]. Available at: <https://www.ipcc.ch/sr15/chapter/chapter-1/>

to do more than its fair share, but **we are asking Ireland to do its fair share to secure a system-wide, transformational decline in the use of fossil fuels**. In the absence of rapid emissions mitigation, the world will pass 1.5°C in the early 2030s.³ To have any chance of limiting global warming to 1.5°C we need to cut *global* emissions more or less in half by 2030 (this means cutting 28GtCO₂eq off annual global emissions)⁴ and to near zero by 2050.

But that is *globally*, and under any definition of climate justice and according to the principle of Common but Differentiated Responsibilities and Respective Capabilities in the 1992 UN Convention on Climate Change, rich countries like Ireland, the EU as a whole, and the US must cut emissions more steeply and quickly. As pointed out by Professor Anderson during the Joint Oireachtas Committee meeting on the carbon budgets, if a globally fair and equitable system of emissions cuts was applied, Ireland would need to reach net zero emissions by 2029 (not 2050) to play its part in keeping temperature rise to 1.5°C.

So while we accept, however reluctantly, that it is probably impractical, if not impossible, for Ireland to reduce its emissions by more than 50% in 9 years it is important to recognise that our 2030 target of halving emissions and the two carbon budgets that the Climate Council has proposed to 2030 still do not amount to our fair share of the effort required to fulfil the Paris Agreement. Ireland will continue to use more than our fair share of the remaining global carbon budget consistent with the 1.5°C goal for the rest of this decade.

However, Ireland can do more, faster, before 2050. If the world needs to get to near zero emissions by 2050, rich countries should get there sooner. Sweden, Portugal and Germany have put 2045 into law, while Austria and Finland have adopted 2040 and 2035 as target dates in policy. And our own Climate Act 2021 is clear that Ireland should reach climate neutrality by 2050 *at the latest*.

In contrast the Climate Council's third carbon budget seems to assume a linear path from 2030 to net zero in 2050. That is not good enough, and it's not clear how they took climate justice into account when considering that recommendation.

It is crucial therefore that before adopting the third carbon budget as binding a full analysis is undertaken to identify Ireland's fair share of the remaining 1.5C global carbon budget and how soon we can get to near zero emissions.

On this basis we make the recommendation that the Oireachtas should approve the first two carbon budgets but that the Minister should write to the Climate Council formally requesting that they undertake such analysis before they review and revise their proposal for the binding version of the third carbon budget and the provisional version of the fourth carbon budget. And that this request is noted in any motion to approve the Carbon Budget Programme (of all three budgets) by the Dáil and the Seanad.

³ IPCC, 2021: Summary for Policymakers. In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)]. Cambridge University Press. Available at: <https://www.ipcc.ch/assessment-report/ar6/>

⁴ UNEP (2021) Emissions Gap Report 2021. Available at: <https://www.unep.org/resources/emissions-gap-report-2021>

It is also worth noting that *international aviation and shipping emissions are not incorporated in the carbon budgets. These emissions are significant for Ireland (~4 MtCO_{2eq} in 2018), primarily in aviation. These emissions fall within the scope of the Paris Agreement⁵ and there is clear precedent for integrating international aviation and shipping emissions into the carbon budgeting process.* For example, the UK has incorporated its share of international aviation and shipping emissions into the 2033-2037 carbon budget.⁶ While the Carbon Budget Committee Report⁷ calls for measures to be taken to plan for assessment or inclusion of aviation and shipping emissions in future carbon budgets, we underline the need for these to be both assessed and included.

Sectoral Emissions Ceilings

Every sector of society and the economy must do its fair share to reduce emissions. Some sectors will move faster than others, but every sector will have to reduce its emissions drastically, starting now, and get to zero or close to zero, as fast as possible. As the IPCC states: limiting global warming to 1.5°C will “*require rapid, far-reaching and unprecedented changes in all aspects of society*” across land, energy, industry, buildings, transport, and cities.⁸ In setting the Sectoral Emissions Ceilings, it is important to recognise that **any sector that argues for reducing their emissions by less than the average is in effect stating that another sector should reduce by more than 51%.**

As part of the carbon budget process, any sector (or any relevant Government Department or agency) which seeks to do less than its fair share, should be tasked with identifying the sector(s) which they consider should shoulder a higher emissions target and to present this analysis to the public. If agriculture, for example, reduces emissions by 33% - the top of the indicative range announced by the Government – the rest of society and the economy has to reduce its emissions by 60%, which is challenging but just about conceivable. If however agriculture were only to reduce its emissions by 22% - the bottom of the range announced by Government - the rest of society and the economy would have to reduce its emissions by 66%, which would stretch the bounds of credibility and equity to breaking point.

It is absolutely imperative that relevant Government Departments, bodies and state agencies respect obligations under the 2021 Climate Act and ensure that sectors engage intensely and swiftly with targets while respecting the sectoral emissions ceilings which flow from the carbon budgets.

It is also worth noting a crucial characteristic of the indicative sectoral emissions reductions ranges in the Climate Action Plan 2021: **we will only meet the overall binding 51% emissions target if all sectors achieve the upper range of their reduction target. It is**

⁵ Inclusion of emissions from international aviation and shipping in Nationally Determined Contributions – Legal Advice. Available at: <https://www.transportenvironment.org/wp-content/uploads/2021/10/Re-Aviation-Shipping-NDC-UPDATED-Legal-Advice-Final-3-5-21-corr-1.pdf>

⁶ GOV.UK (April 2021) UK enshrines new target in law to slash emissions by 78% by 2035. Available at: <https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>

⁷ Joint Committee on Environment and Climate Action, Report on the proposed carbon budgets (Feb. 2022). Available at: https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_environment_and_climate_action/reports/2022/2022-02-07_report-on-the-proposed-carbon-budgets_en.pdf

⁸ IPCC (2018) Summary for Policymakers of IPCC Special Report on Global Warming of 1.5C approved by governments. Press Release. Available at: https://www.ipcc.ch/site/assets/uploads/2018/11/pr_181008_P48_spm_en.pdf

essential that this is factored into the preparation of the 2022 Climate Action Plan and the conversion of the indicative reduction ranges into specific sectoral emissions ceilings under the law.

A fair and just transition where the vulnerable are protected

Communities and workers who are affected by the phase-down of emission-intense economic activity (such as those in the Midlands and around Moneypoint) are entitled to the resources and supports they need to continue to have economic opportunity, decent employment, and flourishing communities. Further, they are entitled to have their representatives, for example the trade unions, engaged in formal, structured, social dialogue about how to achieve a Just Transition. Central to this is the opportunity to engage in policy development before decisions are made. It is important that this process is prioritised, including as part of the planned Just Transition Commission, given that the roll out of energy solutions alone will lead to the creation of 17,000 to 28,000 jobs by 2030.⁹

Moreover, it is imperative that those on low incomes or at risk of poverty must not be further disadvantaged or marginalized by climate action, for example either by increasing fuel poverty or the skewing of subsidies towards schemes that primarily benefit the wealthier sectors of society.

Finally, Government must respect procedural and participatory rights. Communities and workers impacted by changing business models or phasing-down of activities should be entitled to: (a) have their voices heard by decision makers at an early stage before decisions are made, (b) have their responses addressed in policy responses, and (c) receive equitable and tailored supports. For example, ensuring that farmers have access to alternative land use options (such as renewable energy development or carbon sequestration particularly rewetting degraded peatland). The energy transition also presents a unique opportunity to prioritise the most vulnerable Irish households and protect them from escalating energy costs. Government must prioritise urgent measures to ensure they are not further disadvantaged and marginalised as we take climate action. This means a particular focus on **retrofitting of social housing and targeting subsidies at those most at risk of energy poverty.**

Climate Finance

The Technical Report (p. 8) outlines that “*an appropriate contribution to the Paris Agreement is an appropriate response to international climate justice*”. The first thing to note is that the Carbon Budget Programme is not aligned with our fair share of the global effort to achieve the goals of the Paris Agreement and that therefore we have yet to make “an appropriate contribution”. Moreover, this serves to side-line the importance of contributing our fair share to climate finance to help lower income countries adapt to the impacts of climate change. It is crucial that Ireland contributes **our fair share to climate finance and prioritises the scaling up of our contributions**. The €225 million per year pledge made by Government at COP 26 falls far too short of our fair share, which should be closer

⁹ MAREI (2021) The value of energy: a new framework for the transition to net zero. Available at: <https://www.marei.ie/the-value-of-energy-a-new-framework-for-the-transition-to-net-zero/#:~:text=4.,the%20end%20of%20the%20decade>

to €500 million per year.¹⁰ Our increasing contributions to climate finance must not come at the expense of Irish Aid to build the health, education and social systems they need to develop. If we fail, existing inequalities will be worsened, and as Philip Alston (UN Special Rapporteur on Extreme Poverty and Human Rights, 2019) puts it we risk a scenario “*where the wealthy pay to escape overheating, hunger, and conflict, while the rest of the world is left to suffer*”. We urge the Government to prioritise the development of the **Climate Finance Roadmap** and **Climate Diplomacy Strategy** which are due by the end of Q2 2022.

Leadership

We are in full agreement with the IPCC and Climate Change Advisory Council’s call for significantly **enhanced levels of climate leadership** (Technical Report, p. 10). This leadership should include, as a priority, shifting the discourse towards **reducing consumption of fossil fuels across the Irish economy**. Ireland must also champion climate action and fossil fuel phase out at international level. We note in particular:

- Ireland’s membership of the Beyond Oil and Gas Alliance including the commitment to put in place a clear process to phase out oil and gas production.
- In May 2021, the Government produced a policy statement which introduced a moratorium on shale/fracked gas imports and the development of polluting Liquefied Natural Gas terminals pending the completion of an energy security review (to be completed over the coming months). The statement notes that the “*Government will work with international partners to promote the phasing out of fracking at an international level within the wider context of the phasing out of fossil fuel extraction*”¹¹
- Commitments made as part of the Dublin Climate Dialogues, including “*a commitment to a just transition from fossil fuels, with a plan for every country in place by 2025 and execution through 2030; a commitment to eliminating fossil-fuel subsidies in every country no later than 2025; a commitment to phasing out coal power generation in every country by 2030 and natural gas power generation in that decade.*”¹²

Embed climate justice within the carbon budgeting process

It is also crucial that the principles of climate justice are firmly embedded within the carbon budgeting process. **The Climate Change Advisory Council must fulfil their legal duty under the Climate Act to take climate justice into account in preparing the carbon budget.** It is unclear from the documents published by the Climate Change Advisory Council how they have done so. Specifically, the Council’s indicative third Carbon Budget (2031-2035)

¹⁰ Christian Aid Ireland and Trocaire (Nov. 2019) The Cost of Inaction: Ireland’s responsibilities for global climate finance. Available at: <https://www.christianaid.ie/sites/default/files/2019-12/The%20Cost%20of%20Inaction%20-%20Irelands%20responsibilities%20for%20global%20climate%20finance.pdf>

¹¹ Department of the Environment, Climate, and Communications (May 2021) Policy Statement on the Importation of Fracked Gas. Available at: <https://www.gov.ie/en/publication/f3774-policy-statement-on-the-importation-of-fracked-gas/>

¹² Dublin Climate Dialogues: Influencing outcomes for COP26. Available at: <https://dublinclimatedialogues.com/wp-content/uploads/2020/10/THE-DUBLIN-DECLARATION-Conclusions.pdf>

proposed a reduction rate of 8% a year from 2026 to 2030 but puts forward a reduction rate of only 3.5% from 2031 to 2035. It seems to presume a linear reduction path from 2030 to near zero in 2050. The new climate law is clear that Ireland should reach climate neutrality by 2050 *at the latest*, and richer countries must reach net zero sooner than 2050 given the principles of climate justice and Common but Differentiated Responsibilities. Given that the third carbon budget (2031-2035) is indicative, we propose that the Committee asks the **CCAC to undertake further research and analysis on Ireland's fair share of the remaining global carbon budget prior to making a formal proposal on the binding limits for the 2031-2035 carbon budget.**

The carbon budget process is still ultimately (only) a mechanism for ensuring accountability and coherence. Adherence to that budget is only as good as the planning and resources dedicated to it. This is where it is fundamental that **we see transparent Departmental implementation backed by ongoing Government commitment and strong oversight by the Oireachtas.** The Climate Change Advisory Council underlined the significant 'implementation gap' in their annual review.¹³ It should be noted that the Climate Action Delivery Board has held just three meetings from 2019 to 2020, and did not hold any meetings between Q1 and Q3 2021.

Finally, while carbon budgets are a necessary and useful mechanism by which to reduce emissions, setting a carbon budget suggests that we have emissions credit left to spend. But all we have to do is look to the recent wildfires, heatwaves, and flooding on our doorstep to fathom the scale of our debt. The bottom-line is that **without urgent emission reductions in accordance with our Paris Agreement obligations** we will be adding to our carbon, moral and ecological debt to those in the Global South who have done least to cause climate change and are being hit first and hardest, and to younger and future generations.

¹³ Climate Change Advisory Council (2021) Annual Review 2021. Available at: https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/contentassets/publications/CCAC_AnnualReview_2021.pdf