



An Cláíomh Glas

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08 02 2022

Re. Submission to the public consultation on the draft carbon budget

To Whom It May Concern,

An Cláíomh Glas welcomes the opportunity to respond to the Public Consultation on the Climate Change Advisory Council's proposed Carbon Budgets.

Please acknowledge our submission and inform us of any further consultation periods.

Kind regards,

[REDACTED] An Cláíomh Glas, and in a personal capacity.

Introductory remarks:

The following comments are offered on behalf of An Cláíomh Glas, an Irish eNGO, and the undersigned also in a personal capacity. They are made without prejudice to fundamental reservations about the Climate Action and Low Carbon Development Act, 2015, as amended by the CLIMATE ACTION AND LOW CARBON DEVELOPMENT (AMENDMENT) ACT 2021 – referred to hereafter as the Climate Act, including on Constitutional Grounds.

In the context of the imperatives to act, and to act swiftly, effectively and decisively on Climate Change, such concerns about the Climate Act are now gravely compounded by the fundamental issues and inadequacies of the draft carbon budgets as proposed.

In the context of these budgets being in the hands of a Green Minister with responsibility for bringing the recommendation forward – it is imperative that the Minister listens to the scientists, who have been ignored for too long for political and economic expediencies, and it is imperative the Minister engage to amend the budgets to improve the ambition, and the efforts to support a really just transition to assist those who will find the transformation needed most challenging.

To continue to defer and 'kick the can down the road' to further administrations as is proposed in these budgets, is not only short sighted, given the incredible burdens and risks which will be faced in particular by our youth, and most vulnerable, but it is also morally repugnant in the face of the grave injustice and suffering and deaths which will result from climate change. Additionally it is also of serious legal concern in respect of Ireland's obligations under i.a. the Paris Agreement.

We wish to support the calls of those experts who have indicated the need for

More ambition

More ambition is needed as the average 6% p.a. reduction in draft budget is much less than 7.6% recommended by the UN Secretary General as being necessary to comply with the Paris Agreement, and that emissions reductions of 7.6% are needed on global average each year until 2030 for a chance of staying below 1.5 degrees Centigrade. It is critical to reflect that is actually assuming massive negative emissions later – which simply cannot be relied upon. The Climate Change as proposed less than 6% and the proper analysis of the proposed reduction has been sadly lacking in the Government's and CCAC's presentation of the budgets.

A 7% reduction would mean 468 MtC₂e to 2030 – so -27 more of a reduction than proposed by the CCAC

Achieving what is a bare minimum requirements of 7.6% would mean a budget of 454 MtC₂e – so a further reduction of at least -41 on the CCAC proposal.

Accounting issues

We have significant concerns with definitions and objectives in the Climate Act which lend themselves to unproven, intangible and unreliable accounting methods particularly when it comes to removals, sequestration, net emissions.

Of particular concern is the potential to allow borrowing from future budgets, and the notion of future removals which cannot be relied upon, or calculated with sufficient accuracy and this is entirely unacceptable.

The focus must be on actual reductions in emissions, and reductions in demands and increased efficiencies in our approach. To do otherwise is to throw Climate Justice 'under a bus'. It is just simply unethical and immoral in the context of a planetary Climate Emergency and those suffering most from Climate Change now and who will in the future

Just Transition:

There is a need for properly structured and supported Just Transition to assist those most impacted by the changes in a more ambitious carbon budget. In particular we need a really effective Just Transition for those on low incomes and who will be most impacted by fuel poverty.

We find the notion of Government monies being offered to allow people choose how to spend money of concern where that money could be used on climate damaging activities, services and goods. It should be directly channelled to deal with the costs of increased fuels and food.

It will be critical to assist the Agriculture sector and call for major reductions in methane and a move away from intense farming for unsustainable "Big Agri Food". There is a need for a real meaningful rewards for shift to biodiversity friendly and climate friendly & farmer friendly farming.

Trade

There is a need to address the unsustainable and climate damaging nature of Irish AgriFood Trade.

Need for an Emergency Response:

We are calling for an emergency response to the Climate Emergency, not a much delayed warm-up lap. The average 4.8% per year reduction proposed for the 2021 to 2025 is a wholly inadequate response to the problem and pushes the heavy lifting out

We support these further more detailed recommendations also:

1. The proposed carbon budgets for 2021–2030 need to be reduced significantly. This is essential to provide a genuine good faith effort based on the best available science and an adequately prudential approach to limiting our global warming contribution in line with the 1.5°C Paris Agreement goal. This would require a reduction of
 - I. at least 27 MtCO₂Eq. from 495 MtCO₂eq to 468 MtCO₂Eq. to align with the Programme for Government and
 - II. a further reduction of 40 MtCO₂Eq. to allow for Ireland’s projected international shipping and aviation emissions, as allowance must be made for these with regard to the Paris temperature goal even though they are not covered by the Regulation.
 - III. a reduction equivalent to the emissions of all other economic activities (including for example, bottom trawling) which currently contribute to global GHG emissions but are not currently accounted for in the national process.
2. The proposed budgets need to use a reference year of no later than 2015, the year of the Paris Agreement, to indicate a “minimally equitable” consideration for global fairness as a basis for Ireland’s ‘fair share’ of the remaining global carbon budget¹.
3. Under the Act, consistency with the Paris Agreement (the ‘Paris Test’) must adequately consider equity-based action, the principle of common but differentiated responsibilities and respective capabilities, and climate justice. This necessitates the CCAC and Government to fulfil its legal obligation in providing explicit detail for the unavoidable value judgements in its Paris Test regarding prudence (the accepted probability of limiting to 1.5°C), historical responsibility, equity and global climate justice.
4. It will be crucial to establish a simplified framework of monthly carbon budgeting accounting, quarterly assessment and accountability relative to target GHG pathways, and, if off-track, a clear mechanism for policy course-correction.
5. ATCC strongly advises against focussing narrowly on the projected annual emissions in 2030, and instead urges that budgets should focus on the emissions trajectory and warming impact of the differing GHG reductions in the allocation of sectoral emissions ceilings.
6. The proposed carbon budgets require a much more front loaded approach to ensure that the precautionary principle is adopted to achieve at least the required reduction by 2030.
7. Nitrogen budgeting, monitoring and limiting nitrogen usage (via fertiliser and feeds) in total and by catchment is strongly recommended to limit GHG, ammonia and nitrate pollution.
8. Unproven technologies for methane or N₂O reduction, or carbon dioxide removal (CDR), must not be relied on in meeting targets and should be explicitly detailed as to expected total budget impact over time, with timelines for technology, and investment cost
9. Protecting existing carbon storage in standing forest and drained organic soils is now crucial to limit near-term land carbon losses that are currently projected to rise until 2035. Given the climate emergency, serious consideration must be given to limiting forest harvest to 2030 and removal of inappropriate forestry to ensure that the annual sequestration rate in forest related sinks is maintained while biodiversity and water quality are protected.
10. ‘Natural carbon sinks’ and nature-based sequestration measures, particularly *carbon farming* (soil carbon sequestration) should have significantly less prominence in carbon

¹ McMullin et al, A.H., 2019.. Mitig Adapt Strateg Glob Change. 25, pp. 579–602

budgeting due to the uncertain nature of the carbon storage longevity of these methods in an increasingly volatile climate that has the potential to cancel such investments rapidly.

The pre-legislative scrutiny of the proposed budgets provided an important opportunity to hear directly from expert scientists in the field, and voices who for too long have been ignored. It was therefore of grave concern how their evidence was dealt with in the Committee's report. However it now remains up to the Minister, and the Oireachtas to rise to the challenge collectively of revising the budgets to make them more ambitious and to accompany that with a comprehensive programmatic effort to facilitate a just transition to support those