

From: [REDACTED]
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To: CARBON BUDGET CONSULTATION
Subject: Submission, Public Consultation on Carbon Budgets.
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Hello,

Please see attached and below my observations on the documents provided in support of the carbon budgets consultation.

Regards,

[REDACTED]

Public Consultation on Carbon Budgets – Submission 2022

- Pursuing carbon budgets according to the CCAC's Technical Report ensures Irish compliance with IPCC, UNEP, EU law, the enlightened 2021 Climate Action Act, and conditions for life on earth.
- Carbon emissions impact analyses should be introduced into every sector without exception, given how various activities can reveal surprising carbon outcomes. These should become a requirement of funding, contracts and other partnerships, and keep the responsibility alive in all actors' minds.
- Short one or two-page fact-sheets for each sector should be prepared, based on the Technical Report, for wide distribution to all interested parties.
- Little or no reference is made to how the public will be informed of, and engaged in all the recommendations made. Brian Davey argues that failure is inevitable without participation by civil society. People want to help but fear that threats to their essential needs go ignored. Citizen participation, as a right, and for full buy-in, should be front and centre rather than an after-thought. There is no way climate goals can be achieved without popular support. The RTE programme Eco-Eye provides the sort of coverage that could be built on. Another option is to create an organisation dedicated to educating, advising and reassuring the public about carbon budget implementation. Like Development Media International that promotes health in Low Income Countries.
- Being open to unexpected initiative sources, for example the utilities, could reap benefits and improve chances of success. "Environment and business can walk hand-in-hand and once the limits to the fossil energy supply and thus to economic growth are recognised their interests become aligned." (Douthwaite and Knight)
- Do not confuse decarbonisation strategies with new market gaps for financial growth. Avoiding regulatory capture and co-option by persuasive corporate lobbyists encountered at every turn might be the most hazardous hurdle of all to negotiate. The latest letter from the Scholars
Warning confirms that international climate policy failed due to decades of corporate influence

- Relying mainly on institutional models for data greatly increases reification risk – the so-called fallacy of misplaced concreteness - which has sabotaged many a fine theory. Having said that, the modelling of Cap and Share by [Laurence Matthews](#)'s merits study, and includes proposals for climate payment convergence, an equality measure now being attempted under the Common Agriculture Policy.
- [Indigenous traditional rural people](#) should be treated as experts to consult and work with; showing how the economy can serve life and not the other way round.
- Re. p 15, 34+, "Sustainable development of the agriculture and land use sector can deliver important win-win opportunities while the Common Agricultural Policy may be used to support improved management of livestock farming alongside provision of ecosystem services", for related details, see <https://villagemagazine.ie/if-the-cap-fits/>
- That linked article refers to Professor JL Sadie's 1960 essay 'The Social Anthropology of Economic Development' (Economic Journal) asserting that economic development requires "social disorganisation." A recent article by [Professor Howard Richards](#) suggests why such negative consequences occur, and steps to address them. Clinging to assumptions of economic growth and external development of this kind sabotages any hope of achieving carbon budgets.
- An example of a project brilliantly drawing together private landowners, farmers, communities and academics to halt environmental damage and conserve selected areas, is the [Macgillvuddy Reeks European Innovation Partnership Project](#).
- More than one way often exists to deal with carbon pollution, and certain practices produce disproportionate results. To illustrate, the atmospheric climate protection associated with the bacterium *Pseudomonas*, which grows on tree leaves, compounds the more obvious benefits of expanding forest cover ([Douthwaite and Knight](#)). Let nature help. [Biochar](#) for soil fertility and removing carbon is also promising. This possibility of mixed interlinked approaches has major implications for challenges including the management of livestock numbers.
- It is time to remove institutional barriers to growing crops like hemp which have positive fuel, construction, fabric and other eco-safe applications.
- Regional panels of ecologists would support those willing and able to play a part.
- In 2012, Feasta published a collection of open-eyed insights by scholarly activists into a proposed Cap and Share carbon policy. Since this Cap concerns limiting carbon emissions, [Sharing for Survival](#) is highly relevant here and now, and contains many constructive ideas worth considering. Touching on s. 3.3. of the Technical Report, the Share element envisages several modes of just distribution, including via a basic income, vouchers, service coupons and so on, of money returned by fossil fuel companies buying carbon production permits. [Caroline White's](#) chapter is especially apt, while [James Bruges](#) presents the case of India. The dilemma of stabilising emissions is approached from multiple angles, with due acknowledgement of the slippery complexity of the 'wicked problem' at hand, and in particular, the danger of unintended consequences if the balance of measures selected is not right.
- Justin Kenrick discusses [economics of the commons](#), as theorised by Eleanor Ostrom and others. [Nick Bardsley](#) weighs up [policy](#) considerations, and John Jopling explores operating effectively for the planet at the [world level](#).
- In bringing budgets to other government departments, it is important to be prepared for many policy conflicts. For example, the zoned land tax announced in the 2021 budget could negate efforts to prevent carbon-intensive developments.
- Notably absent from the technical report is information about carbon differentially embodied in building materials – see [interactive pyramid](#). Sanctioning the use of carbon-intensive material to seal houses without taking into account long-term environmental harms poses a real danger of perpetuating unintended consequences.
- Omission of emissions from air and sea travel is illogical and requires rationale. All exceptions and exemptions should be phased out as soon as possible.

- Section 1.2 p. 16 + of the Technical describes Land Use, Land Use Change and Forestry in Ireland compared to the EU. That the country is less industrialised, with significantly greater land activity, is an advantage. Land is the raw material for the best available carbon mitigation measures, including afforestation, organic farming, rewilding, community-managed protected areas. Some are fleshed out more in Sharing for Survival, and elsewhere. This unique aspect deserves much more attention because it could make all the difference. Ireland could become a world leader in wise land stewardship for successful climate controls and prosperity.