

From: [REDACTED]
Sent: Tuesday 8 February 2022 15:55
To: CARBON BUDGET CONSULTATION
Subject: Consultation on Carbon Budgets - Submission

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To Whom It Concerns,

Thank you for the opportunity to make a submission relating to Ireland's proposed first two carbon budgets. I have the following points to make:

1. I am concerned that the ambition in these budgets is not enough and falls short of the promises made in the programme for Government which commits to an "average 7% pa reduction in overall greenhouse gas emissions from 2021 to 2030. I note that Professor Barry McMullin of Dublin City University demonstrated that the current proposed budgets are cumulatively equivalent to an annual reduction rate of just under 6% per year until 2030. This is extremely troubling as a 2019 report from the United Nations Environment Programme (UNEP) stated that a global average annual reduction of 7.6% would be required to stay within 1.5°C global temperature increase. To "keep 1.5 alive" Ireland, as a wealthy country, cannot do less than the average and must increase it's ambition.
2. It is essential that the MtCO2eq amount in each Carbon Budget relates only to emissions and removals measurable within the time period of that budget. Projected emission reductions which might occur beyond the time frame of a carbon budget must not be included when calculating or assessing the achievement of that carbon budget. There needs to be clarity on this as there have been ambiguity regarding "forward counting" in relation to forestry. The CCAC have been clear that trees planted now will mainly deliver carbon sequestration after 2030. If after 2030, trees have started to sequester or remove carbon, then that can be appropriately included in the 2030-2035 budget, however must not be prematurely included as part of the current carbon budgets.
3. The Carbon Budgets as currently proposed are extremely 'backloaded' with far more emphasis on emission reduction in the 2nd carbon budget 2025-2030 budget than on emission reductions in the current budget. This will increase pressure on the second budget period. This can be addressed by acting earlier, using access to low interest finance and implementing longterm supports for change. A Just Transition can be both fast and fair and indeed must be fast and fair.
4. The proposed Carbon Budgets should be addressed to make them more 'consistent' with Articles 2 and 4(1) of the Paris Agreement, including 'equity' and "common but differentiated responsibilities and respective capacities". The Minister should also strengthen the consideration and weighting given to climate justice when finalising the proposed Carbon Budgets and review the proposed carbon budgets to address these issues

In particular, as the first budget is very likely to fall short on climate justice and fair share, it should be accompanied by other measures like additional, climate funding.

Yours sincerely,

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