



European Parliament



8 February 2022

**Minister Eamon Ryan TD**

*Via email* [carbonbudgetconsultation@decc.gov.ie](mailto:carbonbudgetconsultation@decc.gov.ie)

Climate Division – Carbon Budgets

Department of the Environment, Climate and Communications,

29-31 Adelaide Road,

Dublin, D02 X285

Re. Public Consultation on Carbon Budgets

Dear Minister Ryan,

I welcome the consultation, and I look forward to the further mainstreaming of the carbon budget into the work of Government. I note the Climate Change Advisory Council's carbon budget letter and accompanying technical report. My views are as follows.

1. The Irish Government must follow the science. It should ensure that our national and EU targets are met or exceeded, and it should take account of emerging knowledge in the years ahead. The target of ensuring global temperatures do not exceed 1.5 ° C. degrees should inform the Government's work.
2. Climate justice must be at the heart of the Irish Government's efforts to tackle climate change. Proposals such as deep retrofitting should initially focus on social housing and provide upgrades for the homes of those most at risk of energy poverty.
3. It is important that any transition between gross-net and net-net accounting do not lead to a loss of ambition in Ireland's efforts to take climate action. All sectors of society must play their part in reducing emissions, and effort-sharing must be progressive to ensure that the vulnerable are protected.
4. I strongly endorse the view of the Climate Change Advisory Council that the carbon budgets should be consistent with the National Biodiversity Action Plan. Indeed, there is considerable scope for the budgets to align with the goals of the biodiversity plan.
5. Recent research on Land Use, Land Use Change and Forestry should feed into policies that are pursued. Significant recent research on feeds, breeds and grasses has considerable scope to reduce emissions. Scientific research by Teagasc and others on carbon farming should inform future developments. Reductions in afforestation rates in recent years are a cause for concern and should be addressed by policy changes.
6. Regarding retrofitting, a sufficient supply of skilled practitioners is required to undertake the upgrading of all our building stock to a zero-energy standard. This requires a concerted effort by third-level institutions to provide sufficient courses to meet demand. This will require new apprenticeships and professional courses.

If more skilled workers are available, higher targets for carbon reductions within the built environment are feasible.

7. Transport has huge potential to assist in reaching carbon targets. New roads rarely, if ever lead to carbon reductions. Improvements in public transport can and will assist in reaching our carbon goals. The good work on electrifying public transport should be ramped up, and the quality of service must meet and exceed public expectation and demand. A greater emphasis should be placed on tele-working to reduce transport demand.
8. The increased finance that has been made available for active travel in walking and cycling projects is welcome. There is still greater scope to ramp up investment in sustainable transport. This could involve the provision of segregated cycle lanes, 'safe routes to schools' and other investments. There is still significant scope to increase modal share for active travel.
9. Spatial planning has a crucial role to play in reducing travel demand. New development must be accessible by public transport. Local Authorities should make available serviced sites in or close to town centres as an alternative to one-off rural housing that can lead to long-distance car commuting.

In summary, there is significant scope for ambition in land use, retrofitting and active travel measures.

Many thanks for your consideration of my submission, I wish you well in your work.

Sincerely,

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