

Consultation on Carbon Budgets – submission by [REDACTED]

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Section 1: Current carbon budgets are not sufficient to address the climate crisis.

The current proposed carbon budget's **fall short of the required global average** for annual emission reductions and **far, far short of Ireland's fair share** of annual emission reductions. The bullet points below expand on this.

- The current proposed budgets are cumulatively equivalent to an annual reduction rate of just under 6% per year until 2030 - as was demonstrated to the Joint Oireachtas Committee on Environment and Climate Action by Professor Barry McMullin of Dublin City University.
- The current carbon budgets therefore fall short of the United Nations Environment Programme 2019 report recommendations that a global average annual reduction of 7.6% would be required to stay within 1.50C global temperature increase and the average 7% per annum reduction" commitment in the Programme for Government.
- Very importantly, as was highlight by Dr Andrew Jackson's statement to the Joint Oireachtas Committee on Environment and Climate Action, **the 7.6% UNEP figure is predicated on vast so-called negative emissions** – that is, the need to somehow remove >200 Gt of CO2 globally from the atmosphere by the end of this century. We have no plan for this globally or nationally, and the IPCC notes that it is a "major risk" in seeking to limit heating to 1.5°C. CCAC highlighted these assumed large-scale negative emissions in its recent Annual Review 2021, noting in this regard that the State has not yet delivered its Long-term climate strategy to the European Commission, now more than two years after the legal deadline of 1 January 2020.
- Excluding these massive negative emissions (which are assumed but which are unlikely to be achievable - for more on negative emissions see this Friends of the Earth report), **the true scale of the challenge is an annual global average reduction of approximately 15% per annum**. See more commentary on this by Dr Andrew Jackson here.
- As a wealthy country, with one of the highest per capita emissions in the EU - and with high historic emissions - **Ireland has a responsibility to reduce its emissions much faster than the global average**. As a wealthy nation, Ireland also has a greater capacity to rapidly transition to a low carbon society than poorer countries. For all of these reasons, it is unconscionable that the current carbon budgets fall so far short of Ireland's global fair share of climate action and that they do not even meet the required global average of annual emission reductions per year. The carbon budgets should be reconsidered so that they deliver much greater emission cuts and

Ireland should also increase its climate finance to poorer countries to at least €500 million a year and support (and provide finance for) the development of a Loss and Damage Finance Facility at COP27. It should also condemn the EU's blocking of such a facility at COP26 and take active steps to ensure the EU actively supports, and does not obstruct, Loss and Damage Finance at COP27.

Section 2: More ambitious carbon budgets are possible within a different economic system - we need to think creatively & pursue Degrowth policies

If current carbon budgets cannot deliver Ireland's fair share of emission reductions then we need to consider a **different type of economic system - that would facilitate the cuts we need, while being politically acceptable at the same time**. We need to be creative and question our current economic system. [Dr Jason Hikel](#) and many others have [published extensively](#) to demonstrate that a "degrowth" or "post growth" economic system is both essential (and possible to achieve) in wealthy countries if we are to achieve the emission reductions required to avoid runaway climate breakdown.

The 2018 special report of the IPCC indicates that, in the absence of speculative negative-emissions technologies, the only feasible way to remain within safe carbon budgets is for high-income nations to actively slow down the pace of material production and consumption. Reducing material throughput reduces energy demand, which makes it easier to accomplish a rapid transition to renewables. This approach is also ecologically coherent: reducing material throughput not only helps us to address climate change, but also removes pressure on other planetary boundaries. This is known as 'degrowth'.

Degrowth is a planned reduction of energy and resource throughput designed to bring the economy back into balance with the living world in a way that reduces inequality and improves human well-being. It is important to clarify that degrowth **differs fundamentally from a recession - as is demonstrated by Hikel et al in [this paper](#)**.

Policymakers commonly regard economic growth as a proxy for human development and social progress. But past a certain point, which high-income nations have long exceeded, the correlation between GDP and social indicators breaks down or becomes negligible. For instance, Spain significantly outperforms the USA in key social indicators (including a life expectancy that is five years longer), despite having 55% less GDP per capita. When it comes to achieving strong social outcomes, what matters is not a continuous increase in commodity production, but access to livelihoods and provisioning. In high-income countries, delivering the latter does not require additional growth; rather, it requires a fairer distribution of income and wealth, and guaranteed access to universal public services.

As is demonstrated in a recent [paper published in Nature Energy \(available here\)](#) post-growth scholarship calls for high-income nations to shift away from pursuing GDP growth and to focus instead on provisioning for human needs and well-being, such as by **reducing inequality, ensuring living wages and a jobs guarantee, shortening the working week to maintain full employment, and guaranteeing universal access to public healthcare, education, transportation, energy, water and affordable housing**. This approach enables strong social outcomes to be achieved without growth, and creates space for countries to scale down ecologically destructive and socially less necessary forms of production and consumption, as proposed by degrowth research.

In high-income nations such as Ireland, possible policy interventions might include the following.

- In the transportation sector: shifting from private cars to public and non-motorized transportation; and reducing air travel in a fair and just way, for example by removing

- subsidies for aviation, equalizing or increasing taxes on aviation fuels compared with those of land transport, and introducing frequent flyer levies or a rationing framework.
- In the industrial sector: extending product lifespans through warranty mandates, rights to repair, and regulations against planned obsolescence; incentivizing and institutionalizing second-hand product purchases over new; regionalizing production and consumption where possible to reduce freight; limiting advertizing; and shifting taxes from labour to resources.
 - In the agricultural sector: minimizing food waste; reducing industrial production of ruminant meat and dairy, while shifting to healthier plant-based diets; and prioritizing agroecological methods to sequester carbon and restore biodiversity.
 - In the buildings sector: promoting maintenance and retrofits over new construction; improving efficiency and reducing energy use of existing buildings; reducing the average size of new dwellings; introducing progressive property taxes; and mandating net zero energy certifications.
 - In cities: urban planning to enable 15-minute urban centres requiring little motorized travel and sufficiently compact to encourage reasonable-sized dwellings; and reallocation of some public urban space from parking structures and roads to infrastructure for non-motorized mobility.

Interventions such as these would make it possible to achieve rapid decarbonization consistent with the Paris Agreement goals, without relying so heavily on negative emissions technologies and productivity improvements. A recent study modelling some of these interventions, with equitable access to the energy services required for decent living, brings global final energy demand to as low as 150 EJ, well below the LED and other IPCC scenario.

If Ireland cannot deliver carbon budgets in line with our fair share of global emissions within our current economic system then we have a responsibility to make fundamental changes to our economic system, such as pursuing degrowth policies like those outlined above, and to also encourage other countries to do the same. By doing this we could demonstrate true climate leadership - and show the world what is possible when we are willing to broaden our thinking and be innovative and creative.

For more on degrowth and how it can be achieved please see a range of publications and research on Dr Hikel's website at this link: <https://www.jasonhickel.org/>

Section 3: Forward Counting

The timing of emission reductions matter, especially when we consider cumulative temperature gain and tipping points which could make global heating become irreversible and give it a runaway nature, beyond our control. It is also very important that every country is very clear and factual in relation to carbon budgets. **Therefore, it is essential that the MtCO₂e amount in each Carbon Budget relates only to emissions and removals measurable within the time period of that budget.** Any emission reduction or removals which may occur after that time period must not be included when calculating or assessing achievement of that carbon budget.

While the Ministerial regulations on the CCACs initial development of Carbon Budgets did not include this kind of "forward counting", there is need for a hard guarantee that such accountancy tricks will not be used when assessing Ireland's compliance with those budgets. A clear commitment is needed because over the last few months there have been some ambiguous signals in the National Climate Plan and elsewhere, around potential 'forward counting' on forestry.

Section 4: The Balance Between the first two Carbon Budgets

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. Delayed emission reductions increases risk and pressure on the second budget period, particularly since additional environmental, policy and international variables may emerge which could require further sharp cuts during the 2026 period. For example, it is likely and appropriate that Ireland may have to include aviation and shipping emissions of at least 40 MtCO₂eq in that second budget.

One argument for backloading is that some areas of investment may take a while to deliver results. However, while some good things may take a while to start, we also need to stop doing harmful things and look to fundamentally change our economic system - as it outlined in the section 2 above. Emergency actions will be needed in the next 18 months, for example ending Ireland's derogation from the nitrates directive or strict new rules on demolition. Ireland's roadmap to end payment of €2.4 billion per year in fossil fuel subsidies must be published in 2022 not in 2024 as currently planned.

There is also a strong economic case for earlier action. Countries which act early will lead, and the current suspension of EU fiscal rules and access to low or no interest finance mean that if we act now Ireland can afford both long term public investment and urgent supports for sectoral change. A Just Transition can be both fast and fair.

The Minister should reconsider the backloading between budgets, take full advantage of current macroeconomic opportunities to deliver a fast and fair just transition and take urgent actions to ensure emission reductions in the first 18 months.