

Sent: To: Wednesday 19 January 2022 11:50 CARBON BUDGET CONSULTATION

Subject: Re Public Consultation on Carbon Budgets

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Hi,

While noting the proposed Carbon Budgets of the Climate Change Advisory Council for the period is 295 Mt CO2eq and the annual average percentage change in the period is -4.8% I translated this into an annual emissions target if emissions reductions are a similar % each year.

Year	Mt CO2 EQ				
	2018	68.3	Base		
	2021	65.0	-3.3	-4.8%	
	2022	61.8	-3.1	-4.8%	
	2023	58.9	-3.0	-4.8%	
	2024	56.0	-2.8	-4.8%	
	2025	53.3	-2.7	-4.8%	295.0

- I think it would be helpful to publish this to give a clear illustration of the annual emission targets.
- <u>To report on annual emissions in a timely manner</u> (for example at least by giving rough estimates of the previous year's emissions in Q1 of the following year) <u>so that corrective actions can be taken at an earlier opportunity.</u>
- Considering we are now in 2022, I think it would be useful to publish a preliminary estimate of where we are at in relation to 2021 emissions. Unfortunately considering that:
 - o The SEAI noted in their "Energy in Ireland" annual report that "Because of the reduction in electricity generated by wind and gas and the increase in the use of coal, the CO2 emissions from electricity generation for the first ten months of 2021 were 18% higher than in the same period in 2020".
 - o Petrol and diesel imports have recovered from 2020 (less covid restrictions), and
 - o The number of dairy cows in June 2021 was higher than in June 2020 (so agriculture emissions are unlikely to have decreased much).

So by my rough estimates the first two will lead to an increase of at least 2 Mt CO2eq over 2020 emissions, therefore I think it is likely that 2021 emissions will be over the 65 Mt CO2eq per above, so I think the average emissions reduction needed to comply with the 2021-5 carbon budget will be higher. (If the 2021 emissions are 66 Mt CO2eq, then the average emissions reductions would be closer to 6% per year).

So we are already likely playing catch-up re the annual emissions targets as per the above table.

• So from the above table you can see we roughly need to reduce emissions by 3 Mt CO2eq a year out to 2025 to meet the proposed Carbon Budgets. If this is exceeded then the over emissions will be brought forward to the following 2026-30 budget. Given current policies, trends and technology I think it is highly unlikely we will be under the 62 Mt CO2eq for 2022 as per the above table. In my view this needs to be openly discussed with the view of prioritising actions required at an early stage in the process of the annual Department of Finance's fiscal budget (with the 2023 fiscal budget process being the first opportunity).

dust to note two other points:

- We need credible emission reduction plans in all sectors that are achievable. I think it may be worth
 noting/communicating that the more we miss the targets in the coming years the more pressure that will
 likely be on farming to reduce its emissions as reductions in Methane emissions have a greater impact in the
 short term on Global Warming and you could argue it is more technically controllable from an Irish
 perspective than say having 1 million EVs.
- In relation to a Climate Justice and a Just Transition, if you exclude agriculture, a lot of the emissions
 reductions need infrastructure to be developed and it may be ironic but the slowness of the Irish Justice
 (and planning) system could be a key factor in slowing down emission reductions. There needs to be a
 balance however in my opinion I think this needs to be discussed openly and measures need to be taken to
 make sure Climate Justice, Intergenerational rights and Ireland's emission commitments are better taken
 into account in the overall Justice system.

Kind Regards