

**From:** [REDACTED]  
**Sent:** Tuesday 8 February 2022 12:34  
**To:** CARBON BUDGET CONSULTATION  
**Subject:** Public Consultation on Carbon Budgets

**CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.**

To whom it may concern:

The proposed carbon budgets do not go far enough. They don't match up to either UN standards or the promises in the programme for government, they don't deliver climate justice and there are potential loopholes and accountancy tricks like 'forward counting' which need to be taken off the table.

## The Size of the Carbon Budgets

***To be consistent with the UNEP "average per annum reduction of 7.6%" the proposed carbon budgets of 495 MtCO<sub>2</sub>eq budgets should be reduced by about 41 MtCO<sub>2</sub>eq – to a total of 454 MtCO<sub>2</sub>eq***

- Each Carbon Budget is written in Megatons of emissions (MtCO<sub>2</sub>eq). Currently, the first two proposed budgets, up to 2030 add up to 495 MtCO<sub>2</sub>eq
- Presenting to the Joint Oireachtas Committee on Environment and Climate Action, 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.
- 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. Ireland as a wealthy country should be aiming to do more than the average, we certainly shouldn't be doing less.
- The current Programme for Government commits to "an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030". The phrase 'overall' here makes it clear that these emissions should be calculated cumulatively.
- Under section 6A of the Climate Act, the budgets are required to be consistent with the ultimate objective of Article 2 of the UN Framework Convention on Climate Change which calls for "stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system." IPCC science has been very clear that any temperature increase beyond 1.5°C is indeed dangerous. The goal must be to "keep 1.5 alive".
- The UNEP estimated that a global average annual reduction of 7.6% would reflect a 66% chance of staying within 1.5°C. The 6% average annual reductions in the current proposed carbon budgets only reflects a 50% chance of staying within 1.5°C.
- **To be consistent with the "average 7% per annum reduction" commitment in the Programme for Government. the proposed carbon budgets of 495**

**MtCO<sub>2</sub>eq budgets should be reduced at least 27 MtCO<sub>2</sub>eq to a total of 468 MtCO<sub>2</sub>eq**

- **To be consistent with the UNEP “average per annum reduction of 7.6%” the proposed carbon budgets of 495 MtCO<sub>2</sub>eq budgets should be reduced by about 41 MtCO<sub>2</sub>eq – to a total of 454 MtCO<sub>2</sub>eq**
- However, even reducing the budgets by these amounts would fall short of climate justice and represent less than our ‘fair share’ internationally.

### **Forward Counting:**

- Carbon Budgets are in MtCO<sub>2</sub>eq amounts because they relate to the real physical reality of Greenhouse Gas Emissions which as we know have very real impacts. When those emissions occur also matters, particularly if we consider cumulative temperature gain and tipping points which may be irreversible.
- Because climate change is a shared challenge on a shared planet, it is very important that every country is very clear and factual in relation to carbon budgets. This is essential in terms of the science and in terms of public trust.
- **It is essential that the MtCO<sub>2</sub>eq 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.
- Done properly and with “the right tree in the right place”, forestry can play a key role in climate action. The CCAC have been clear that trees planted now will mainly deliver carbon sequestration after 2030. Given the long-term nature of this kind of investment, it is appropriate that additional early supports and subsidies be given to encourage planting. However, **this must not include any premature counting of potential future removals in current Carbon Budgets. We cannot and must not seek to adjust planetary facts to suit economic interests or incentives.** If after 2030, trees are still there and have started to sequester or remove carbon, then that can be appropriately and usefully included in the 2030-2035 budget.

### **The Balance Between the Two Budgets**

- The Carbon Budgets as currently proposed are extremely ‘backloaded’ with far more emphasis on emission reduction in the 2<sup>nd</sup> carbon budget 2025-2030 budget than on emission reductions in the current budget.
- Procrastination 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 2026-2030 period. For

example, it is likely and appropriate that Ireland may have to include aviation and shipping emissions of at least 40 MtCO<sub>2</sub>eq 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. 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 first 18 months.**

### **Common but Differentiated Responsibilities and Climate Justice:**

***The 2030-2035 Carbon Budget must deliver on climate justice and be consistent with Paris principles of equity, common but differentiated responsibilities and respective capacities. A review of the 2026 – 2030 carbon budget should also be scheduled to address these issues***

- Article 2(2) of the Paris Agreement specifies an obligation “to reflect equity and the principle of common but differentiated responsibilities and respective capabilities, in the light of different national circumstances.”
- Under section 6A of the Climate Act, the Climate Change Advisory Council (CCAC) were required to be consistent with Article 2 of the Paris Agreement, however the CCAC have not reflected certain aspects of Article 2(2) when developing and assessing their proposals. In their Technical report they state, in respect of fair share that “Any such determination has implicit or explicit implications around climate justice, historical responsibility, equity and equality. It is not the job of the Council ...to make such value judgements”. There is a strong argument that consideration of these matters is in fact part of the CCAC's job. However, for now, it falls to these next political stages of the Carbon Budget process to address ‘equity’ and ‘fair share’.
- Under section 3(3) of the Climate Act, the Minister and the Government are required to carry out their functions under the Act (including in respect of carbon budgets) in a manner consistent with Articles 2 and 4(1) of the Paris Agreement’ including the provisions on equity and common but differentiated responsibilities.
- Witnesses to the Climate Action Committee were very clear that the current draft carbon budgets would use more than our fair share of the global carbon budget and do not reflect the principle of equity or common but differentiated responsibilities.
- **The Minister should revise/reduce the proposed Carbon Budgets, 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**
- **More emphasis, analysis & policy tools, including those used by UNEP, should be applied by CCAC and the Minister to assess Irelands "fair share" of emission reductions under Paris and our responsibilities in terms of climate justice.**
- **The 2030-2035 Carbon Budget must deliver on climate justice and be consistent with Paris principles of equity, common but differentiated responsibilities and respective capacities. A review of the 2026 – 2030 carbon budget should also be scheduled to address these issues**
- **As the first budget is very likely to fall short on climate justice and fair share, it should be accompanied by other measures like new, additional, climate funding.**

Yours sincerely



Sent from [Mail](#) for Windows