

From: [REDACTED]
Sent: Thursday 20 January 2022 09:56
To: CARBON BUDGET CONSULTATION
Subject: Carbon budget consultation submission

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Dear reader,

I am fully supportive of the proposed carbon budget programme and believe that, where possible, the budgets should be set lower than the proposed levels so as to allow even less emissions over the coming 15 years.

Below are some more specific comments on areas where feedback was requested.

Effort sharing over first two budgets:

The proposed budgets of 295 MtCO₂eq and 200 MtCO₂eq for the two five-year periods from 2021-2025 and 2026-2030 represent a moderately backloaded approach to reducing Ireland's emissions by 51% by 2030 from 2018 levels. I can accept that, due to in-built lag associated with policy implementation, the average emissions reductions over the first budget period will be lower than those over the second budget period. However, it still feels that an amount of emissions equivalent to 4.32 years' worth of 2018 emissions for the first 5 years is rather high (especially considering the efforts in 2019 and 2020 from climate action plan 2019 which should have the starting point lower than 2018 emissions). If feasible, the quantity of emissions in the first budget could be reduced towards 4 years' worth of 2018 level emissions (273.2 MtCO₂eq).

The political system (politicians, the civil service and state and semi-state agencies) is still explicitly denying the scale of the challenge associated with the proposed carbon budgets (even as they are). It was extremely disappointing to see the climate action plan 2021 published with sectoral decarbonisation ranges that are not centred on achievement of the 51% total reduction (i.e. the midpoint of all the ranges taken together should correspond to a 51% total reduction but doesn't). Rather than allowing informed discussion about societal trade-offs this has precipitated sectoral ultimatums based on unrealistically large quantities of emissions. It would probably have been better to not publish such ranges at all and to address sectoral shares initially through the division of the adopted carbon budgets.

Given that the consequences of overshooting the carbon budgets are much more significant than those of undershooting the carbon budgets, the precautionary principle would suggest that we should strongly err on the side of emitting less than the budgets. Consequently, subsequent climate action plans should include measures such that each sectors emissions should come in **below** their sectoral emissions ceiling.

Third budget:

There is definitely scope for increased ambition in the third budget period.

To take a concrete example: The 51% reduction by 2030 is achieved if the 41.2 MtCO₂eq from energy, industry and waste in 2018 reduces by ~65% and the 27.1 MtCO₂eq associated with agriculture and

LULUCF reduces by ~35%. In this scenario, in 2030, the former will represent ~43.5% of emissions and the latter ~56.5% of emissions. Given that the carbon intensity of electricity should be declining towards zero by 2035, the retrofitting program should be fully scaled up, vehicle fleets should be turning over quickly and fossil-fuel based heating and cooking infrastructure should be in fast decline it stands to reason that the energy system emissions should continue to decline at pace. If it continues at the ~10% average yearly reduction of the previous decade then the total energy emissions over those 5 years would be ~ 53.7 MtCO₂eq. This would leave a 97.3 MtCO₂eq gap to the CCAC third budget proposal of 151 MtCO₂eq. 97.3 MtCO₂eq represents more than 5 years' worth of 2030 level agriculture and LULUCF emissions. This simple example illustrates that a significantly tighter carbon budget should be adopted for the third budget period.

CCAC technical report:

I am concerned regarding the analysis of climate justice and the associated "Paris test" presented in the technical report. The test purports to not make any value judgements but in only looking at additional emissions it completely discounts Ireland's disproportionate usage of the global carbon budget for 1.5 degrees Celsius to date. There are no ways of sharing out the remaining global carbon budget that do not include making moral judgements. It is much better to acknowledge this and to explicitly state what judgements are being made and the rationale used to justify those judgements.

Other observations:

It is disappointing that the emissions associated with international aviation and shipping have not been included in the carbon budgets. Decarbonisation of these transport modes needs to be driven at both national and international level (national action is especially important given that, to date, the IMO and ICAO have not set decarbonisation pathways consistent with the science). I would prefer to see the budgets revised prior to their adoption to include these emissions from the outset. If this is not done, then the approach of the UK where a timeline for the inclusion of these emissions is given should be followed.

Kind regards,