

**From:** [REDACTED]  
**Sent:** Saturday 5 February 2022 16:14  
**To:** CARBON BUDGET CONSULTATION  
**Subject:** Carbon Budget Consultation

**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.**

Dear Minister Ryan,

I am deeply concerned that Ireland's first two Carbon Budgets as currently proposed are not ambitious enough. I ask you to consider the following important points.

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 1.50C global temperature increase. Ireland as a wealthy country should be aiming to do more than the average, we certainly shouldn't be doing less. 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 1.50C is indeed dangerous. The UNEP estimated that a global average annual reduction of 7.6% would reflect a 66% chance of staying within 1.50C. The 6% average annual reductions in the current proposed carbon budgets only reflects a 50% chance of staying within 1.50C.

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.

**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.**

**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.**

**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 Ireland's "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.

Regards

[Redacted]

[Redacted]