[redacted]

From: [redacted]
Sent: Tuesday 20 September 2022 17:31
To: Call For Evidence
Subject: Call for Expert Evidence 2022

The following submission on the Climate Action Plan consultation is made on behalf of An Claíomh Glas and in a personal capacity.
In the first instance we wish to adopt the submission made by An Taisce, the National Trust for Ireland, and additionally the letters from leading legal and climate academics ([redacted]on the issues in August to Minister Ryan and cabinet colleagues with the sectoral emissions ceilings announced prior to that letter, and the earlier concerns raised in respect of the target of 51% reduction.

The Climate Action and Low Carbon Development Act as amended, in section 4(2) requires the climate action plan to effectively deliver on the carbon budgets, and to be consistent with them.
In the context of the issues with the sectoral ceilings which are necessary to deliver on the carbon budget programmes, and the issues set out in the letter referred to above - the basis of reductions and allocation of reductions against which a plan can be developed clearly first needs to be both properly acknowledged and addressed, lest we compound error with errors.

Additionally, there remain fundamental unanswered questions about the capacity to develop alternative renewable sources of electricity given the failure to develop a maritime spatial plan in accordance with both the Maritime Spatial Planning Directive and the underpinning Marine Strategy Framework Directive, and protections required under BOTH pillars of the Habitats Directive and requirements of the Birds Directive. Similar issues arise in respect of expectations on what can be delivered through forestry given the failure to properly assess the potential of what can be delivered lawfully - without compromising legal obligations in respect of Biodiversity.

The most recent IPCC report acknowledges the inter-dependent nature of the climate and biodiversity crisis - but the architecture being pursued under the climate act is effectively to pursue climate action at the expense of biodiveristy on the expectaion this can be sorted later. This is not just misguided and unlawful - but will also serve to ultimately frustrate climate action as that which is unlawful will invariably be comproimsed in its delivery and the timeframes for this.
There is a need to adjust course to correct errors and to gather the issues on the flawed frameworks being pursued.
Given issues with access we would ask this be considered as emailed

Yours sincerly
[redacted]