

16th November 2022

Dear Minister Ryan and members of the Irish delegation,

We, the undersigned members of Stop Climate Chaos, are writing to express our concern around the lack of progress seen at COP27 negotiations to date, with the risk of COP27 being labelled a failure.

These final days leave an opportunity for Ireland to step up and show leadership by advocating for an outcome that reflects equitable commitments in emission reductions and climate finance.

Ambition & Mitigation

An NDC increase of 2% by the EU is neither sufficient nor aligned with an equitable contribution to the Paris Agreement, which would require a 65% reduction in EU emissions. Ireland should support stronger ambition in the formation of a cover text that reiterates our commitment to limiting warming to 1.5°C and calls for strengthened NDCs. Ireland should support the following addition:

“Calls upon Parties to revisit and strengthen NDCs with a timeframe up to 2030, including through incorporating new and strengthened sectoral and non-carbon dioxide targets or actions, to align with 1.5C by at least 43% aggregate reductions by 2030 over 2019 levels to be in line with equity “

COP27 must build on the COP26 cover decision by acknowledging the need to phase-out all fossil fuels, not just coal. To build on the foundation set in Glasgow, and to avoid COP27 being criticised as a failure, Ireland should champion the addition of the following to the cover text:

“Calls upon Parties to end expansion of new fossil fuel production and to accelerate efforts towards the phaseout of fossil fuel power and phase-out of fossil fuel subsidies, acknowledging the need to an equitable phase-out of all fossil fuels including coal, oil and gas;”

Ireland, as a founding member of BOGA, and a leader internationally in ending domestic fossil fuel production, should now follow Tuvalu and Vanuatu in endorsing a global Fossil Fuel Non-Proliferation Treaty during COP27.

Finance

We would also like to see a commitment to a roadmap for the delivery of a doubling of adaptation finance that was committed to at COP26, along with a commitment to reaching at least 50% of all climate finance for adaptation. Year after year richer countries have failed to meet their promises and this is eroding trust within the negotiations. A clear commitment at this COP is vital to rebuild trust. As part of this Ireland should deliver its fair share of climate finance of approx. €500 million.

The reality is that climate finance globally needs to shift from billions to trillions in order to reach the scale that is needed and the actual needs of people at the frontlines of this climate crisis, who have done so little to cause this but are paying the price. The cover decision should identify a transformation in climate finance in order to deliver adequate, predictable, new, additional, needs based and human rights based public finance. This should include debt cancellation and identify innovative sources of finance, including the reallocation of IMF Special Drawing Rights and a windfall tax on the profits of polluting corporations.

Loss and Damage

With regard to the negotiations, it has been important to see the EU acknowledging the gaps in Loss and Damage Financing and considering a process for moving this work forward, however, we are very concerned that Ireland and the EU are not supporting the outcome of the establishment of a finance facility at this COP. The focus on the Global Shield is a distraction from the key ask of developing countries and cannot adequately address the scale of financing needed for loss and damage.

It is a matter of climate justice that Ireland and EU play a leadership role in agreeing to funding under the UN Framework Convention on Climate Change that will be based on principles of equity and human rights. A commitment to a finance facility will be key to the success of this COP, as a precursor to the adequate, predictable flow of finance to affected communities, at the scale that is needed.

Further delay on this issue is a denial of climate justice and lacks the urgency that is needed to deal with escalating climate crises that people in the Global South are experiencing right now. The cover decision should include a commitment to establish a Loss and Damage Finance Facility.

Gender and Minority Rights

So far, we have been dismayed at the weak outcomes achieved on the UNFCCC Gender Action Plan mid-term review at COP 27, where no substantial content was integrated on the gender differentiated impact of loss and damage, on gender transformative adaptation, just transition, access to finances, and the inclusion of key implications of climate justice on SRHR and GBV.

We urge that Ireland is engaged fully in the UNFCCC Gender Action Plan to strengthen and substantiate these aspects of the Gender Action Plan, and turn its commitments into activities and indicators, including defined roles and responsibilities for countries' UNFCCC gender focal points and, vitally, to enable women's rights organisations to practically gain access to climate finance.

On the question of gender and minority rights, we urge that Ireland continues ensure the prioritisation of all women, girls, people with disabilities, LGTBQI+ people, and the most marginalised sections of society in policies and planning on adaptation, climate finance and loss and damage; and advocates strongly for this until the end of COP 27.

We request that Ireland acts to make gender disaggregated reporting mandatory in all streams of the UNFCCC Global Stocktake Cycles and under the Enhanced Transparency Framework; to ensure all policy instruments are gender-transformative (ie. NDCs, NAPs, and other national instruments).

On climate finance, we need Ireland to focus on improving meaningful participation, access to finance and decision-making from women. Practical guidance to the Green Climate Fund, to which Ireland gave €4 million in 2020, is clearly required in order to strengthen its gender impact..

Action for Civil Empowerment and Civil Society

The Glasgow pact invites countries to put in place a plan for ACE, Action for Civil Empowerment. The six topics of ACE are education, training, public awareness, public participation, access to information and international cooperation.

Ireland is doing well at ACE and we feel it would be useful to collate our current actions as a basis for a national ACE plan. This is a worthy action insofar as it will identify what's being done in Ireland within the ACE framework, ensure there's a joined up plan that will traverse governments and offer an opportunity to cooperate internationally in sharing our work and learning from others. This could be done in conjunction with an academic institution.

Article 6

The Subsidiary Body under the article 6.4 mechanism has now been set up, but much work remains to be done to introduce effective safeguarding mechanisms to ensure that all credits generated under A6.4 are verifiable, additional and permanent and to ensure appropriate corresponding adjustments to national inventories are made. The concerns that the scientific community and NGOs have articulated about the real mitigation potential of offsetting mechanisms have not been adequately addressed to date by the Supervisory Body or COP decisions.

We are concerned that there is a growing trend of countries entering into bilateral agreements with host non-Annex I parties under A6.2, as they anticipate a surge in demand for 6.4ERs and ITMOs by 2030. These agreements represent the reality that rich developed countries are buying their way out of having to reduce emissions to a level that is consistent with their 'fair share' of the remaining global carbon budget and the Paris Agreement. The same can be said of the Voluntary Carbon Market (VCM) which is growing rapidly yet without any single international set of verification standards or supervision.

We call on the Irish government to resist any pressure to use article 6 to reach Ireland's NDC, and that any policy decision to use offshore mitigation should be first debated in the Dáil with an appropriate amendment to the Climate Act 2021. In addition, we call on the Irish government to introduce effective legislation to outlaw all claims and advertisements of climate neutrality by corporations, unless accompanied by a transparent and verified climate report covering scope 1-3 emissions.

Yours,

Stop Climate Chaos

Friends of the Earth

Christian Aid

Trócaire

Oxfam Ireland

Clare PPN

Feasta

An Taisce



**Friends of
the Earth**



Trócaire



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