

## SCC Submission to Public Consultation on Climate Policy and Legislation

### ABOUT YOU

**\*1. Your details (If you provide an email address it will be used to notify you of developments related to this survey.)**

<b>Name* (required):</b>	Stop Climate Chaos
<b>Company:</b>	
<b>Email Address:</b>	

**\*2. Location: If you are in the Republic of Ireland, please indicate your location, otherwise please select N/A**

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### 3. Affiliation

<input type="checkbox"/>	Academic
<input type="checkbox"/>	Business
<input type="checkbox"/>	EU ETS Installation
<input type="checkbox"/>	Individual citizen
<input checked="" type="checkbox"/>	NGO
<input type="checkbox"/>	Professional Organisation
<input type="checkbox"/>	Public Authority
<input type="checkbox"/>	Representative Body
<input type="checkbox"/>	Think tank
<input type="checkbox"/>	Trade union
<input type="checkbox"/>	Other (please specify):
<input type="checkbox"/>	

### 4. How did you hear about this consultation?

<input type="checkbox"/>	Environ.ie website
<input type="checkbox"/>	Internet
<input type="checkbox"/>	Newspaper
<input type="checkbox"/>	Notified by another organization
<input type="checkbox"/>	Radio
<input type="checkbox"/>	Word of Mouth
<input type="checkbox"/>	Other (please specify):
<input type="checkbox"/>	

**Information Point: National Emissions Profile and Ireland's targets**

Ireland has a somewhat unusual greenhouse gas emissions profile in a European context. There are a number of contributory factors, including a very high level of agriculture emissions; a relatively low proportion of emissions falling within the scope of the EU Emissions Trading Scheme (ETS) where abatement options tend to be cheaper; and a low population density coupled with a tendency for dispersed settlement that inhibits the cost-effectiveness of mass transport systems and encourages car ownership.

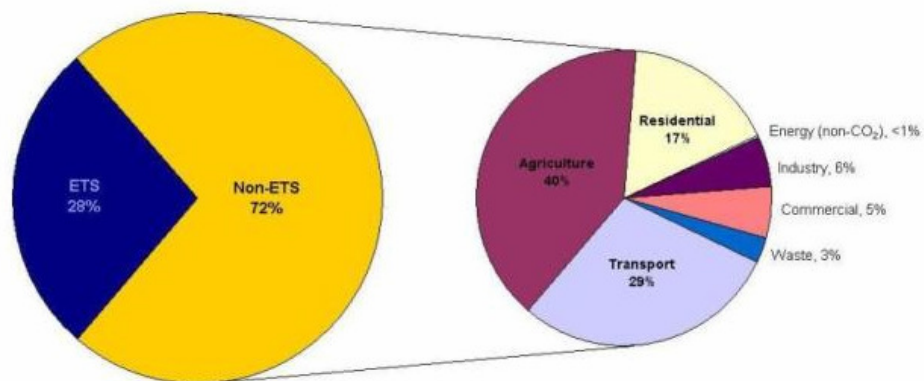
Within the EU, mitigation of greenhouse gas emissions in the period 2013-2020 will fall into one of two categories:

ETS – The EU Emissions Trading Scheme which covers industrial installations across the EU including around 100 Irish installations. By 2020, the ETS sector as a whole across the EU is required to deliver a 21% reduction in emissions relative to 2005.

Non-ETS – These are the emissions outside the ETS and are covered by the 2009 EU Effort Sharing Decision. Under the decision, each Member State has an individual target to meet. By 2020, Ireland's target is to achieve a 20% reduction in emissions relative to 2005. This reduction is required to take place along a trajectory, which will be fixed, and will start in 2013. Post Kyoto commitments. Emissions from the following sectors fall outside the ETS – agriculture, transport, waste, light industry, commercial and residential; these account for approximately 72% of total Irish emissions.

Further information on the national emissions profile and national climate policy generally is available in the National Climate Policy Review, published in November 2011. The Review is available at: <http://www.environ.ie/en/Environment/Atmosphere/ClimateChange/ClimatePolicyReview2011/>.

**In 2009, the breakdown of emissions was as follows:**



**Choosing the policies and measures to cut emissions**

5. There are a number of approaches that could be used by Government to determine the mixture of policies and measures to be employed to reduce greenhouse gas emissions.

In your view, which of the following approaches would be preferable:

	Least cost abatement, meaning that each mitigation option will be examined for its costs and benefits and the cheapest emission reductions will be identified and implemented no matter which sector they arise in
	Least cost abatement subject to consideration of additional, specified criteria
	Sectoral targets based on equal % reductions for all sectors
	Sectoral targets based on negotiations at Government annually or multi-annually such as occurs in advance of the annual financial budget
	Don't know/No opinion
x	<p><b>Other (please specify)</b></p> <p>Justice should underpin Ireland’s approach to climate policy and measures. This means that Ireland’s action on climate change should be directed at ensuring Ireland does its fair share, based on national responsibility and capacity, of the global effort to reduce emissions and support adaptation and low-carbon development in developing countries. Justice is also key to action at the domestic level. In developed and developing countries alike, people living in poverty who are already vulnerable will be those most impacted both by climate change and, potentially, by the responses to it.</p> <p>A ‘least cost approach’ would be problematic. Currently cost analyses do not reflect the true costs of action or inaction. If the development and implementation of climate policy is to facilitate a transition to a truly sustainable economy and society it is imperative that narrow economic cost analyses be replaced by more comprehensive ‘cost-benefit’ analyses, incorporating both the social, and environmental costs and benefits of actions and inaction, as well as the economic costs and benefits.</p> <p>Scientific integrity should also underpin Ireland’s approach to climate policy. Policy measures intended to deliver on commitments to emission reductions should meet rigorous standards of environmental integrity.</p>

6. If an approach were being implemented that would require additional impacts to be taken into account in choosing policies and measures to reduce greenhouse gas emissions, how important would you consider inclusion of the following impacts?

	Very Important	Important	Don't Know/No opinion	Not Important	Shouldn't be included
Impact on administrative burdens					
Impact on air quality (and related benefits for health, reduced acidification etc..)					
Impact on competitiveness					
Impact on investment					
Impact on jobs					
Impact on quality of life					
Impact on regional development					
Impact on rural communities					
Impact on social inclusion					
Other (please specify)	Each of these factors are important and should be part of an overall cost-benefit analysis of proposed measures. An additional factor not listed here is global justice. Both global and domestic justice should underpin Ireland's approach to climate policy.				

**Policy Instruments**

Different policy tools are available in the fight against climate change and each creates its own set of winners and losers. It is important to assess the impacts of various types of measures and how they interact with each other in determining an optimum set of policies and measures.

For each of the potential policy instruments listed below, please indicate how important you consider them in Ireland's policy response to climate change and meeting greenhouse gas emission reduction targets, and why?

**7. Taxation measures (examples could include a carbon tax, differentiated motor tax, congestion charging in cities)**

Very Important	Somewhat Important	Not Important	Don't Know/No opinion

Reason...

**8. Tradeable Permits in the non-ETS sector (examples could include schemes similar to the Emissions Trading Scheme or other "cap and trade" or "cap and share" schemes)**

Very Important	Somewhat Important	Not Important	Don't Know/No opinion
		✓	

Reason...

**9. Subsidies (examples could include grant schemes for firms or individuals like those administered by SEAI)**

Very Important	Somewhat Important	Not Important	Don't Know/No opinion

Reason...

**10. Regulation (examples could include legislation requiring certain actions, codes of practice, or the adoption of standards for certain goods or services)**

Very Important	Somewhat Important	Not Important	Don't Know/No opinion

Reason

**11. Information (examples could include campaigns to improve consumer awareness or the introduction of voluntary or mandatory labeling schemes)**

Very Important	Somewhat Important	Not Important	Don't Know/No opinion

Reason...

**12. Other (please specify)**

Reason...
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**13. FLEXIBILITIES**

The effort-sharing decision provides some flexibility for Member States in meeting their targets. These flexibilities are designed to lower the overall cost of compliance and could be used beyond a certain threshold where domestic actions become more expensive. The decision provides for a range of flexibilities including the purchase of emission allowances from other Member States (from their unused allocations) or the purchase of credits from projects that reduce emissions in developing countries.

**What role do you see for purchased units in meeting Ireland's target?**

	A substantial role, if these options are cheaper than domestic abatement they should be used to the fullest extent possible
	A significant role, but subordinate to domestic action to ensure investment in the domestic economy
	Don't know/no opinion
	A small role, a strict national limit on purchases should be in place to maximise domestic action

√	No role, targets should be met solely through domestic emission reductions
Please include any additional comments	
<p>Buying carbon offsets overseas means we are not investing sufficiently in emission reductions in Ireland. Transition to a low-carbon economy needs to begin as soon as possible, relying on purchasing credits from overseas is an expensive way to delay action. Furthermore, there is much evidence that international offsetting mechanisms are not achieving additional emissions reductions (reference) and are thus highly questionable from an environmental integrity point of view.</p> <p>It is also questionable whether credits bought overseas make a positive contribution to sustainable development in the developing countries in which they are purchased. In many cases offsetting is not helping developing countries take a low-carbon path. In fact, perversely, a large proportion of offset revenues are subsidising carbon-intensive industries, or projects building fossil-fuel power stations. Vulnerable people in developing countries cannot afford false solutions. There are also documented cases linking international carbon offsetting schemes with human rights violations in developing countries.</p> <p>Use of offsetting mechanisms should not have a role in Irish climate policy.</p>	

**Potential barriers to cutting emissions**

The following is a non-exhaustive list of potential barriers to reducing Ireland's greenhouse gas emissions. Please indicate how serious you consider each issue to be and, if possible, identify practical measures that might address it.

**14. Lack of appropriate technology in some sectors**

Serious issue	Minor issue	Not an issue	Don't know/No opinion
Please include any additional comments/specific examples here and, where possible, indicate how the specific barrier(s) identified could be overcome			

**15. Lack of appropriate infrastructure in some sectors**

Serious issue	Minor issue	Not an issue	Don't know/No opinion
Please include any additional comments/specific examples here and, where possible, indicate how the specific barrier(s) identified could be overcome			

### 16. A lack of commitment to act across society

Serious issue	Minor issue	Not an issue	Don't know/No opinion
<p>Please include any additional comments/specific examples here and, where possible, indicate how the specific barrier(s) identified could be overcome</p>			
<p>It is inappropriate to place public commitment to act alongside technical barriers to action. The public is heterogeneous and the factors shaping their views, interests and values are complex. Individuals, households, businesses, interest groups, government departments and state bodies all have their reasons to support, or not, climate action in general, as well as specific proposed measures. The Irish government and the EU have recognised the overwhelming case for action presented by the science. It will never be possible to have support for either action in general or specific actions from all individuals or actors. Fostering understanding of both short and long-term implications of action and inaction and leading sufficient public commitment to do what has been recognised as necessary is the responsibility of government, in cooperation with others. Increased and improved public communication and consultation on climate change and climate action in Ireland would significantly support this.</p> <p>Government must not wait for cross-society commitment to every measure needed to reduce emissions from the whole of society. A legal framework that sets a path for democratic decision-making on what measures to implement, is the best way to build on commitment in society to the principle of averting catastrophic climate change.</p>			

### 17. Ineffective or inefficient carbon pricing

Serious issue	Minor issue	Not an issue	Don't know/No opinion
√			
<p>Please include any additional comments/specific examples here and, where possible, indicate how the specific barrier(s) identified could be overcome</p>			
<p>In order to achieve the required pollution reductions the Government will need to introduce a range of policies that support and incentivise innovation in public services, private enterprises and personal behaviour. The implementation of the "polluter pays" principle endorsed at the Rio Earth Summit will have to be central to that effort. Putting a price on carbon across the whole economy can be a clear and fair way to encourage individuals and organisations to make choices which reduce pollution. The carbon pricing system can and must be designed in a way that ensures the social protection of the most vulnerable people in our society.</p>			

### 18. Incentives not properly aligned with climate change mitigation policy

Serious issue	Minor issue	Not an issue	Don't know/No opinion
<p>Please include any additional comments/specific examples here and, where possible, indicate how the specific barrier(s) identified could be overcome</p>			
<p></p>			

### 19. Difficulties in accessing finance for improvements

Serious issue	Minor issue	Not an issue	Don't know/No opinion

Please include any additional comments/specific examples here and, where possible, indicate how the specific barrier(s) identified could be overcome

**20. Lack of information on the options for individuals/firms to pursue**

Serious issue	Minor issue	Not an issue	Don't know/No opinion

Please include any additional comments/specific examples here and, where possible, indicate how the specific barrier(s) identified could be overcome

**21. Other potential barriers (please specify)**

Reason...

The lobbying of powerful vested interests who oppose action on climate change creates a lack of political will to take the decisions needed to cut greenhouse gas emissions.

### **Changing Behaviour**

Focusing on potential areas for changing behaviour, in your view, are the following possibilities being adequately emphasised at present? If not, how would you propose improving the situation?

#### **22. Reductions to energy bills through roof insulation, window replacement, maintenance or upgrading of heating or air conditioning systems.**

<b>Adequately emphasised at present</b>	<b>Needs some more emphasis</b>	<b>Needs significantly greater emphasis</b>	<b>Don't know/No opinion</b>
Additional comments:			

#### **23. Choosing the most efficient appliances and equipment — with energy labels A(+)**

<b>Adequately emphasised at present</b>	<b>Needs some more emphasis</b>	<b>Needs significantly greater emphasis</b>	<b>Don't know/No opinion</b>
Additional comments:			

#### **24. Potential role of energy audits in improving energy efficiency of homes and workplaces**

<b>Adequately emphasised at present</b>	<b>Needs some more emphasis</b>	<b>Needs significantly greater emphasis</b>	<b>Don't know/No opinion</b>
Additional comments:			

#### **25. The possibility of switching to a provider of renewable electricity**

<b>Adequately emphasised at present</b>	<b>Needs some more emphasis</b>	<b>Needs significantly greater emphasis</b>	<b>Don't know/No opinion</b>
Additional comments:			

#### **26. The possibility of installing a renewable energy generation system**

<b>Adequately emphasised at present</b>	<b>Needs some more emphasis</b>	<b>Needs significantly greater emphasis</b>	<b>Don't know/No opinion</b>
Additional comments:			

**27. Encouraging greater awareness of energy use by promoting awareness of existing on-bill information and the use of IT applications/online calculators to track real-time energy usage**

Adequately emphasised at present	Needs some more emphasis	Needs significantly greater emphasis	Don't know/No opinion
Additional comments:			

**28. Encouraging people to commute to work on foot, cycling or by public transport**

Adequately emphasised at present	Needs some more emphasis	Needs significantly greater emphasis	Don't know/No opinion
Additional comments:			

**29. Low emission vehicles and alternative fuel vehicles like electric cars, biogas buses etc.**

Adequately emphasised at present	Needs some more emphasis	Needs significantly greater emphasis	Don't know/No opinion
Additional comments:			

**30. Availability of alternative fuels for conventional vehicles like biofuel-blended petrol or diesel**

Adequately emphasised at present	Needs some more emphasis	Needs significantly greater emphasis	Don't know/No opinion
Additional comments:			
<p><b>I don't believe Ireland should subsidise and support the use of biofuels as a means to reducing GHG emissions from the transport sector. There is compelling evidence (FAO, IPFRI among others) linking the increased demand for biofuels in Europe and beyond with increased food price volatility and land grabbing across the global south. Indirect land use change (ILUC) factors are not presently examined when looking at the environmental cost of growing feedstocks for biofuel production, nor does the EU look at the social and human rights impacts of biofuel production on people in developing countries as a result of the Renewable Energy Directive's 10% target for the transport sector.</b></p>			

**31. Potential to reduce emissions in food production by buying locally-produced food and seasonal fresh products more often**

Adequately emphasised at present	Needs some more emphasis	Needs significantly greater emphasis	Don't know/No opinion
Additional comments:			
<p><b>Supporting local food production is important in Ireland, as it is in all countries, to support sustainable local (in particular rural) economies and local food production capacity, as well as to reduce the carbon footprint of the global food system. Coherence between promoting purchase of locally produced food in Ireland needs to be coherent with promotion of sustainable agricultural production and a shift in trade and agricultural policies to end the subsidizing of products that are exported to developing</b></p>			

countries below the market price. These policies undermine local markets in developing countries, erode local production capacity and incentivize a global food system with an extremely high carbon footprint.

**32. Encouraging actions that reduce deforestation worldwide (e.g. buying products from certified forests)**

Adequately emphasised at present	Needs some more emphasis	Needs significantly greater emphasis	Don't know/No opinion
Additional comments:			

**33. Compensating for greenhouse gas emissions by buying carbon offsets, i.e financing projects to reduce emissions somewhere else in the world to offset personal/corporate carbon emissions**

Adequately emphasised at present	Needs some more emphasis	Needs significantly greater emphasis	Don't know/No opinion
Additional comments:			
The buying of carbon offsets should not be emphasised at all. Credits bought overseas do not ensure credible emissions reductions. This is because it is almost impossible to prove that most offsetting projects would not have happened anyway without the offset finance- i.e. that they are "additional".			

**34. Education and increasing awareness and understanding of climate change implications**

Adequately emphasised at present	Needs some more emphasis	Needs significantly greater emphasis	Don't know/No opinion
Additional comments:			

**35. Other (please specify)**

Reason...

**EU 2050**

The European Commission has developed a Roadmap to a competitive, low-carbon economy in 2050.

Some of the measures needed to achieve a low-carbon economy in 2050 could bring about more sustainable growth, extra jobs, accelerated innovation, cleaner air, increased energy security and reducing vulnerability to external energy shocks.

In your view, how important should each of the following be in a 2050 plan for Ireland and, if possible, make suggestions on how they could be incorporated?

**36. Sustainable growth**

Very important	Somewhat important	Not important	Don't know/No opinion

Why/How?

**37. Job creation**

Very important	Somewhat important	Not important	Don't know/No opinion
Why/How?			

**38. Innovation**

Very important	Somewhat important	Not important	Don't know/No opinion
Why/How?			

**39. Clean air**

Very important	Somewhat important	Not important	Don't know/No opinion
Why/How?			

**40. Energy security**

Very important	Somewhat important	Not important	Don't know/No opinion
Why/How?			

**41. Reducing vulnerability to external energy shocks**

Very important	Somewhat important	Not important	Don't know/No opinion
Why/How?			

**42. Other (please specify)**

Reason... Similar to the response under question 5 and 6, global and domestic justice should underpin Ireland's 2050 strategy, ensuring the benefits and burdens of action are equitably shared. Action should ensure a balance between social, environmental and economic outcomes to promote a society and economy that is truly sustainable.
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**43. Where would you like to see Ireland in the period to 2050 in terms of its position relative to other Member States?**

√	Among the progressive vanguard of Member States. Ireland should be presenting itself as a forward looking, progressive society with an economy that is sustainable on socio-economic
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	and environmental grounds.
	Playing its full part in a proactive way but not leading the field. Ireland is a technology taker in many areas and therefore cannot be expected to take the risks that may be associated with forging ahead of the pack, particularly given the current economic circumstances.
	Working on a compliance basis. Ireland is in severe economic difficulties that will make reaching all current targets and obligations challenging enough, we should meet our targets but not go further.
	Don't know/No opinion
<b>Additional Comments</b>	
Ireland should continue to associate with and support progressive countries in Europe on climate action, both in relation to emission reduction efforts as well as international climate finance. At the same time, Ireland needs to address the gap between its commitment to progress at the EU level and its performance at the national level. Ireland must have integrity in its action and achieve what it has committed to as well as supporting progressive voices at EU level.	

### *The National Policy Horizon to 2050 - Challenges and Opportunities*

**44. What, in your view, are the three most important initiatives Ireland should pursue in the next five to ten years to begin the transition towards a competitive, low-carbon economy by 2050?**

1. An effective climate law is the most important initiative that Ireland should pursue to ensure transition to a competitive low-carbon economy. A strong climate change law which gives the required certainty would be a powerful signal that Ireland is intent on fulfilling its emission reduction obligations as well as becoming a leading location for the development of a sustainable economy.
2. A clear price on carbon that ensures that the polluter pays.
3. A position at EU and International negotiations in favour of a global reduction in emissions adequate to keep warming to below 1.5 degrees.

**45. Achieving a low-carbon future means investing in the medium to long-term. What three initiatives could, in your view, help Ireland to create a stable environment to encourage investment in low carbon technologies?**

1. Putting our long-term emissions targets into law and mapping out the pathway to get there gives decision makers in government, business and society certainty.

**46. What do you consider to be the three main opportunities associated with building the green economy in Ireland?**

1. Sustainable Green Jobs
2. Energy Independence
3. Foreign investment if Ireland is seen as a global leader in the green economy.

**47. What do you consider to be the three main challenges associated with building the green economy in Ireland?**

1. The lack of certainty for investors. This can be overcome by a legal framework that sets out a clear path to reduction targets and provides certainty that the transition to a low carbon economy will take place.

48. A wide range of additional policies and measures will be required to meet Ireland's current targets and to achieve more stringent targets in the period to 2050. The following list is a non-exhaustive set of possible measures that have been suggested previously or have been used in other countries. Please indicate how you view these options.

	Realistic option, this should be considered	Interesting but more information required	Don't know/No opinion	Not workable	Totally unacceptable
Anaerobic digestion					
Congestion charging in cities					
Conversion of all buses or taxis to biogas or electricity					
Cutting speed limits on all roads					
District heating					
Encouraging action on a collective scale, for example community level actions on insulation or renewable energy for district heating					
Equalisation of retail price of motor fuel with the UK					
Improving the standard of public transport					
Increasing the capacity of public transport					
Individual cap and share					
Migration of all vehicle taxation to a usage basis					
Ruminant tax					
Taxation of fertiliser					
Use of renewable gas (with natural gas) in the gas grid					
Weight based waste collection					
Wide scale introduction of cycle paths to encourage more cycling					
Please add any comments on these options or suggest additional/alternative options					

#### Information Point: Existing Legislation and Targets

Much of the debate surrounding previous proposed legislation in this area focussed on targets for emissions reductions. It is important to have a clear understanding of the targets that are already in place.

## **CONTEXT - the EU Climate and Energy Package**

The policy package which the European Council adopted in December 2008 set out a series of demanding climate and energy targets to be met by 2020, commonly known as the “20-20-20” targets. With a focus on the immediate post-Kyoto period 2013-2020, the high-level objectives of the package are to –

- reduce greenhouse gas emissions by at least 20% compared to 1990 levels;
- reduce primary energy use by 20% compared with projected levels (to be achieved by improving energy efficiency); and
- achieve a 20% level of EU energy consumption from renewable sources.

Specifically in relation to reducing emissions there are two legislative instruments which apply to Ireland:

- A Directive which amends the EU Emissions Trading Scheme (EU ETS), partially transposed into Irish legislation by SI 127 of 2011 - the transposition process will be completed in 2012; and
- A Decision which sets targets for all Member States for reducing emissions that are not covered by the EU ETS (Decisions of this kind have immediate effect in all Member States and do not require transposition).

## **TARGETS FOR IRELAND**

There are no Member State-specific caps or targets under the revised ETS – the revised scheme is based on a single EU-wide cap. Emissions from international aviation are included in the ETS from 2012 onwards.

The 'Effort-Sharing Decision' covers greenhouse gas emissions from sectors of the economy that do not fall within the scope of the ETS, such as agriculture, transport, housing and waste. Under the Decision, each Member State has agreed to a binding emission trajectory for the years 2013 to 2020, based on per capita income when the decision was finalised; in Ireland's case, the trajectory begins in 2013 at the average emissions from 2008-2010 and this decreases annually until at 2020 emissions are 20% lower than 2005.

This means that Ireland has de facto annual targets for each year from 2013-2020 in the non-ETS sector.

## **MORE INFORMATION**

More information on targets is available in the National Climate Policy Review, which is available at <http://www.environ.ie/en/Environment/Atmosphere/ClimateChange/ClimatePolicyReview2011/>.

## ***Climate Legislation***

This section asks you to consider which elements of climate legislation you think will add value to the policy framework.

In relation to targets, please note that Ireland is already legally bound by the Effort Sharing Decision to

reduce non-ETS emissions by 20% on 2005 levels by 2020, and this figure may change in line with EU and international negotiations. The Programme for Government includes a commitment to publish climate legislation that will give certainty to Government policy in line with negotiated EU targets.

**49. Climate legislation in different countries focuses on different areas. The following areas are those that were noted in an international study as areas of focus in legislation. How do you consider the following areas in terms of legislative provision in Ireland?**

	Current legislative provision is adequate	Further/additional legislative provision required	This shouldn't be the subject of legislative provision	Don't know/No opinion
Adaptation to climate change				
Energy efficiency				
Forestry				
Other land use				
Pricing carbon				
Renewable Energy				
Transport				
Additional comments				

**50. Ireland is already legally bound by the Effort Sharing Decision to reduce non-ETS emissions by 20% on 2005 levels by 2020, and this figure may change in line with EU and international negotiations.**

**In your view, how important are the following potential elements of climate legislation in terms of adding value to the policy framework?**

	Very important	Somewhat important	Don't know/No opinion	Not important	Shouldn't be included
Establishing a body to publicly advise Government on most appropriate actions	<input checked="" type="checkbox"/>				
Establishing a system of carbon budgeting	<input checked="" type="checkbox"/>				
Establishing compliance and accountability mechanisms for Government and other actors	<input checked="" type="checkbox"/>				
Establishing institutional structures and processes to ensure policy delivery	<input checked="" type="checkbox"/>				
Establishing procedures to ensure greater policy integration across Government	<input checked="" type="checkbox"/>				
Making provision for sectoral actions	<input checked="" type="checkbox"/>				
Placing obligations on national, regional or local government in relation to adaptation	<input checked="" type="checkbox"/>				

Placing reporting obligations on Government	<input checked="" type="checkbox"/>				
Placing reporting obligations on private sector organisations	<input checked="" type="checkbox"/>				
Setting a longer term statutory objective to 2050	<input checked="" type="checkbox"/>				
Setting statutory objectives for the longer term e.g. for 2030 or 2040	<input checked="" type="checkbox"/>				
Setting up institutional and budgetary structures for climate finance for national action and international commitments	<input checked="" type="checkbox"/>				
<b>Other (please specify):</b>					
Ireland has obligations to provide new and additional resources to support developing countries to adapt to the impacts of climate change and to develop in a sustainable manner. In establishing policy and measures to respond to climate change it is important that provision is made to ensure Ireland will be able to meet these obligations.					

## 51. Statutory Objectives

Since legally binding targets are already set in EU law and any legislative provision will, in line with the Programme for Government, reflect that position, in your view, how important is it to include statutory objectives to signal a longer term approach?

	Very important	Somewhat important	Don't know/No opinion	Not important	Shouldn't be included
Setting statutory objectives for the medium term e.g. 2030 or 2040					
Setting a long-term statutory objective for 2050					
<b>Other (please specify):</b>					

## 52. Establishment of an Advisory Body

Many countries have established bodies to give expert advice to Government on climate issues. Such an Advisory Body has been included in every Bill presented on the subject in Ireland.

In principle, would you be in favour of the establishment of such a body?

Yes	No	Don't know/No opinion
<input checked="" type="checkbox"/>		
<b>Additional comments:</b>		
The independence of the Expert Advisory Body (EAB) must be ensured for it to be effective		

and it must be free to contribute to the public debate on tackling climate change.

### 53. Design of an Advisory Body

In your view, how important are the following features in the design of such a body?

	Very important	Somewhat important	Don't know/No opinion	Not important	Shouldn't be included
Adequate and predictable resourcing	x				
Expert membership	x				
Independence from Government	x				
Independent interaction with the Oireachtas	x				
Independent interaction with the public/media	x				
Open and transparent appointment process	x				
Representative of all major stakeholder groups					x
Requirement on Government to accept recommendations or explain reasons to the Dáil	x				
Requirement on Government to respond to recommendations	x				
<b>Other (please specify):</b> The EAB should be about independent expert advice to Government on the targets and measures needed to ensure Ireland does its fair share on climate change.					

### 54. Positioning of an Advisory Body

Given the economic climate, establishing any new body will require a careful consideration of costs. It may therefore be necessary to locate such a body within an existing structure or organisation. If its independence were assured, what, in your view, would be the most appropriate location for such a body?

For the independence of the Expert Advisory Body to be completely assured it needs to be a stand-alone body and not situated within any other Government Department or State Body.

## 55. Functions of an Advisory Body

In your view, how important are the following potential functions of an advisory body?

	Very important	Somewhat important	Don't know/No opinion	Not important	Shouldn't be included
Annual recommendations on policies and measures that enable reductions in the ETS sector	<input checked="" type="checkbox"/>				
Annual recommendations on policies and measures to meet targets in the non-ETS sector	<input checked="" type="checkbox"/>				
Annual reporting reviewing Government performance	<input checked="" type="checkbox"/>				
Awareness building		<input checked="" type="checkbox"/>			
Making recommendations on the level of use of flexible mechanisms vs domestic action	<input checked="" type="checkbox"/>				
Making recommendations on the sectoral burden-sharing of emissions reductions	<input checked="" type="checkbox"/>				
Production or commissioning of scientific and technical reports on climate change	<input checked="" type="checkbox"/>				
<p><b>Other (please specify):</b> Raising awareness should be among the key functions of the Advisory Body in so far as it should issue public reports on Ireland's performance against its commitments, including recommendations for action, and should profile these through interaction with Oireachtas members and the public via the media and other channels as appropriate. However, general education and awareness-raising on climate change should not be a role for the Advisory Body, whose mandate and resources should be focused on providing rigorous analysis to support policy development and facilitating transparency and accountability in government action.</p>					

## 56. Membership of an Advisory Body

If such a body were established, and five members were to be appointed, in order of your preference which of the following areas do you think those persons should be drawn from? (The area you see as most important = 1, next most important = 2 and so on until all five places are filled.)

	1	2	3	4	5
Agriculture and forestry expertise					
Business competitiveness					
Climate policy at national and international level					
Climate science and other areas of environmental science					
Economic analysis and forecasting					
Emissions trading					
Energy production and supply					
Financial investment					
Overseas development policy					
Social policy					
Spatial policy and land-use including transport					
Technology development and diffusion					
Other (please specify below)					
While acknowledging that keeping costs down is important, the Advisory Body should have a sufficient complement of expertise to ensure analysis and recommendations are sufficiently comprehensive. Each of the areas of expertise suggested are important and should be reflected in the Terms of Reference for the composition of the Body.					

## 57. Placing obligations on Ministers

In terms of sectoral actions - the following requirements have been suggested for Ministers with responsibility for areas like transport, energy and agriculture.

- Establishing a baseline for their areas of responsibility
- Reporting on the policy instruments being mobilised such as taxes, charges, regulation, R&D, green purchasing etc
- Developing credible strategies to reduce greenhouse gas emissions, showing costs, benefits and expected impacts
- Reporting on emissions from their sector(s)

In your view, what actions could be taken to encourage greater policy integration across Government and sectors more generally?

An effective climate law should be developed and implemented to ensure coherent 'whole or government' vision and action in climate change.

**Climate and Policy Development 2012  
Adaptation**

While most of the policy focus to date has been on mitigation, it is also necessary to consider how Ireland can adapt to the unavoidable impacts of climate change. In Ireland, these impacts are likely to include greater weather variability, more rainfall in some areas and less in others and some temperature increases, particularly in winter.

Assessing these potential consequences of climate change and altering our plans and designs to adapt to those impacts of climate changes is referred to as 'climate change adaptation'. Climate change adaptation comprises all spontaneous responses and planned action taken to cope with the impacts of climate change. Adaptation is needed to tackle current climate variability and to anticipate possible future changes, with the aim of reducing risk and damage cost effectively and possibly exploiting any potential benefits. There are significant analytical and policy challenges associated with climate change adaptation and responses will be required from a variety of actors.

**58. Who do you consider to be the most important actor in driving policy in relation to adaptation? (1 most responsibility, 4 least responsibility)**

	1	2	3	4
<b>The European Union</b>				
<b>Central Government</b>				
<b>Local Government</b>				
<b>Individual citizens and firms</b>				
<b>Additional comments:</b>				

59. In your view, how important are the following measures in adapting to the adverse impacts of climate change?

	Very important	Important	Don't know/No opinion	Not important
Adaptation being addressed in local policies/plans				
Adaptation being addressed in national policies/plans				
Adaptation being addressed in regional policies/plans				
Definition of responsibilities				
Easy access to necessary information and tools				
Requirement for public bodies to make adaption plans				
Additional comments:				

60. What do you consider to be the three main opportunities in adapting to climate change in Ireland?

61. What do you consider to be the three main challenges in adapting to climate change in Ireland?

62. Additional comments

The aim of this consultation has been to elicit detailed and structured inputs for consideration in the policy development process. If you have any additional comments that were not suitable for inclusion in any of the previous questions, please include them here.

As a global phenomenon climate change must be seen from a global perspective, even when defining national and local responses. Ireland's climate policy and action must include support to those impacted by climate change, whilst effectively doing its fair share to reign in climate change to ensure the capacity of people to cope and adapt is not breached.

Current international emission reduction commitments point to a further rise in global temperatures of more than 3°C, potentially significantly more - despite commitment by the international community to hold further warming below 2°C. The outcome of the Durban climate conference risks that increases in action will be delayed further, while climate science is telling us that the window for avoiding dangerous climate change is closing.

Vulnerable people in developing countries cannot afford for countries with significant responsibility for climate change to deflect or delay their legal, political and moral obligations to act. It is imperative that the next years see increased action at national levels and a step up in ambition at both national and international levels. As a country with a tradition and reputation for commitment to global development and human rights, Ireland must enhance its contribution to regional and global responses to climate change, and close the gap between political commitment at the international level and its

domestic performance in reducing emissions.

This means working proactively towards equitable and legally binding action at national and international levels in line with the best and latest climate science. It also means ensuring Ireland does its fair share as part of the global effort to reduce emissions, provide secure and predictable climate finance, new and additional resources for adaptation and low carbon development in developing countries. As its Presidency of the EU approaches, Ireland's integrity will be increasingly under the spotlight. The Irish government should ensure Ireland is in a strong and credible position to lead negotiations on climate change within the EU and at the international level, by progressing the enactment of effective climate legislation without delay, fulfilling its obligations on climate finance and supporting progressive policy at the EU level.

**63. Please include any comments in relation to the consultation here.**

The online survey was quite cumbersome and would be off-putting for many concerned citizens with limited online ability and/or technical expertise on climate policy. Engaging the public to enhance awareness and understanding of the issues and enable them to air their views is important in building commitment for climate action.