

Five Tests for the All-of-Government Climate Action Plan

Briefing by the Stop Climate Chaos Coalition on what to look for in the new climate plan promised by Minister Bruton in June

June 2019



Overview

- In November 2018, the Minister for Communications, Climate Action and the Environment, Richard Bruton, announced his intention to develop and implement a new All-of-Government Climate Action Plan, modelled on the Action Plan for Jobs, with actions across all sectors and a particular focus on implementation of policy and coordinated steps based on clear timelines and designated responsibility across government departments.¹
- Since the Minister's announcement in 2018, the Joint Oireachtas Committee on Climate Action, which the Citizens' Assembly on climate change gave rise to, completed their intense cross-party scrutiny of Irish climate policy.²
- This process resulted in the publication in March 2019, of a landmark report comprising 41 detailed recommendations from the Committee to the Government, which represents historic cross-party support for fundamental changes in Irish climate policy. These recommendations provide an important baseline of ambition to shape future Irish climate policy, reduce Ireland's growing emissions and honour our national and international climate obligations.³ On May 9th, the Dáil voted to declare a "climate emergency", and, crucially, to "accept and endorse" the recommendations of the Oireachtas Committee.⁴
- Stop Climate Chaos, the civil society coalition campaigning for Ireland to do its fair share to tackle climate change, has been calling for the immediate implementation of the Oireachtas recommendations "in full and on time". They should all be incorporated into the new All-of-Government Plan.⁵ This Plan, due to be published shortly, is a once in a generation opportunity to change the course of Irish climate policy, and to, quoting the words of Minister Bruton, bring about the "revolution in

¹ When speaking about the preparation of the Plan, the Minister himself acknowledged that the window of opportunity is closing, that Ireland must step up its response to climate disruption and the decisions taken now will define the next century (Source: <https://www.dccae.gov.ie/en-ie/news-and-media/press-releases/Pages/Minister-Bruton-Holds-Summit-on-All-of-Government-Climate-Plan-to-make-Ireland-Leader-on-Climate.aspx>)

² The Joint Oireachtas Committee on Climate Action was established in 2018 with a mandate to consider the recommendations of the Citizens' Assembly deliberations and recommendations on climate action. What followed over an eight-month period was the most detailed, evidence-based scrutiny of, and debate on climate change policy this State has ever seen.

³ See the Stop Climate Chaos coalition press statement on the publication of the report from the Joint Oireachtas Committee on Climate Action: <https://www.stopclimatechaos.ie/news/2019/03/29/crossparty-oireachtas-committee-delivers-historic/>

⁴ The report recommends the delivery of a suite of recommendations for immediate changes to climate policy governance and accountability, in addition to more specific wide-sweeping recommendations across key sectors of the economy and society.

⁵ See the Coalition's briefing (May, 2019): "The Dáil can make this week an historic turning point in Irish climate policy", https://www.stopclimatechaos.ie/download/pdf/briefing_-_the_dail_can_make_this_week_an_historic_turning_point_in_irish_climate_policy.pdf

how we live”.⁶ The upcoming Plan has also been described publicly by the Minister as “very ambitious, seeking a massive shift away from fossil fuels”.⁷

- Given the unprecedented call from across Ireland for strong political leadership on climate change, this Plan will be an important litmus test of how serious and committed the Government are to taking adequate policy steps to reduce Ireland’s greenhouse gas emissions in line with our obligations under the Paris Agreement (2015).

The Five Tests

The Stop Climate Chaos coalition has prepared the following five tests to help assess and evaluate whether or not the All-of-Government Plan amounts to credible climate action:⁸

1) **Does the Plan acknowledge the scale of the challenge?**

Does the Plan accept that Ireland needs to get to net-zero emissions by 2050? Does it acknowledge that EU and Irish 2030 targets must be strengthened in line with the temperature objectives of the Paris Agreement to hold global temperature rise to well below 2°C and to pursue efforts to limit temperature increase to 1.5°C (above pre-industrial levels)? Does the Plan acknowledge that EU and Irish targets need to be strengthened in line with the latest science from the Intergovernmental Panel on Climate Change, which points to a short decade timeframe in which to halve global emissions to keep global warming below 1.5°C?

2) **Does the Plan commit to putting the Joint Oireachtas Committee’s recommendations on governance into law by the end of the year?**

Will the Government bring forward legislation before the summer recess to amend the Climate Action and Low Carbon Development Act (2015) in line with the governance recommendations in Chapter One of the Joint Oireachtas Committee report? This includes putting a new 2050 target into law, 5-year carbon budgets voted on by the Dáil, a strengthened Climate Action Council, and a standing committee of the Dáil to act like the Public Accounts Committee for carbon emissions.

3) **Does the Plan commit to implementing the recommendations from the Joint Oireachtas Committee in full and on time to cut emissions in every sector?**

In addition to implementing recommendations for improved governance and accountability, does the Plan also incorporate all other recommendations from the Joint Oireachtas Committee, and commit to their implementation in full and on time? Does the Plan provide sufficient detail around these measures to cut emissions in

⁶ See:

<https://www.irishtimes.com/news/environment/threat-of-climate-change-requires-revolution-in-how-welive-says-bruton-1.3689512>

⁷ See:

<https://www.irishexaminer.com/breakingnews/ireland/govt-to-finalise-very-ambitious-climate-change-plan-next-month-927068.html>

⁸ See our press release introducing these five tests:

<https://www.stopclimatechaos.ie/news/2019/05/26/politicians-must-now-take-climate-change-from-the/>

every sector of the economy? Will policy measures be sufficiently detailed to allow the EPA to update their projections scenarios (i.e., its *With Additional Measures* scenario) for between now and 2030?⁹

4) **Does the Plan "do the math"?**

Does the Plan quantify the emissions reductions for each policy measure across all sectors? Does the Plan assess these reductions against stated future carbon budgets, meeting existing and revised 2030 and 2050 targets, including prudent, fair-share Paris-alignment?

5) **Does the Plan clarify how the Government will devise the next set of actions?**

Does the Plan acknowledge that the recommendations presented by the Joint Oireachtas Committee must be significantly built upon to meet the State's national and international commitments, and achieve Ireland's fair share of climate action? Does the Plan establish a process and a timeline for developing and adopting the next round of actions? Is there detail on how the Plan will be integrated into Ireland's first National Energy and Climate Plan (due end of 2019), the Long-term strategy (due January 2020), and a revised National Mitigation Plan?

Context: Irish Climate Policy at a Crossroads

Since its establishment in 2007, the Stop Climate Chaos coalition has consistently called for a radical shift in the direction of Irish climate policy.¹⁰ During this time, we have witnessed the unfolding impacts of climate change devastate some of the poorest regions of the world where populations have contributed least to global warming.¹¹ We have also seen that Ireland is not

⁹ Greenhouse gas emissions are projected out to 2035 using two scenarios; With Existing Measures and With Additional Measures. The *With Existing Measures* scenario assumes that no additional policies and measures, beyond those already in place by the end of 2016 are implemented. The *With Additional Measures* scenario assumes implementation of the *With Existing Measures* scenario in addition to, based on current progress, further implementation of Government renewable and energy efficiency policies and measures. See: https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2017-2035/EPA_2018_GHG_Emissions_Projections_Summary_Report.pdf

¹⁰ The Coalitions' 33 members include overseas aid and development, environmental, youth and faith based organisations: Afri, BirdWatch Ireland, Christian Aid Ireland, Climate Case Ireland, Comhlámh, Community Work Ireland, Concern Worldwide, Cultivate, Cyclist.ie, Dublin Friends of the Earth, Eco Congregation Ireland, ECO UNESCO, Feasta, Fossil Free TCD, Friends of the Earth, Friends of the Irish Environment, Good Energies Alliance Ireland, Gorta-Self Help Africa, Jesuit Centre for Faith and Justice, Just Forests, Kimmage Development Studies Centre, Latin America Solidarity Centre (LASC), Liberia Solidarity Group, Methodist Church of Ireland – Council of Social Responsibility, Mountmellick Environmental Group, National Youth Council of Ireland, Oxfam Ireland, Peoples' Climate Ireland, Presentation Ireland, Tearfund Ireland, Trócaire, An Taisce, VITA, V.O.I.C.E., and Young Friends of the Earth.

¹¹ The impacts of climate change are already devastating the poorest countries in the world that have done the least harm. For example, recent flooding in Southern Africa, following swiftly in the wake of Cyclone Idai, is only one of the numerous unfolding large-scale human tragedies of climate change. Ireland, furthermore, is not immune: there are major risks for society, environment, health and economy.

immune, with changing weather patterns and storm activity presenting considerable socio-economic and environmental risks.¹²

During this same time-period, there has been a notable shift in the level of public concern about climate change, alongside a growing demand for a much stronger political response. Nowhere is this appetite more apparent than in the strong consensus for action arising from the Citizens' Assembly in 2017, the recent surge in citizen engagement, and the unprecedented support for climate action on doorsteps and in the ballot boxes in the local and European elections. This groundswell of support shows unequivocally that climate change has moved from the periphery of politics into the centre. The call for change and the public mandate for political action is stronger now than ever before.

The Government has acknowledged that current policies and measures on climate change are not working. In January 2018 at the European Parliament, for example, the Taoiseach stated:

"As far as I am concerned, we are a laggard. I am not proud of Ireland's performance on climate change....There are lots of things that we intend to do so that we can meet those targets. It's something that I am very committed to, and certainly my generation of politicians is committed to. It's not just the right thing to do; it makes sense economically, I think, in the longer term as well."¹³

The inadequacy of current policies and plans in addition to worsening projections has been repeatedly highlighted by the Environmental Protection Agency (EPA) and Ireland's Climate Change Advisory Council, as well as at the EU level. In 2017, the Climate Change Performance Index scored Ireland as being the worst performing country in Europe for climate action while analysis produced by Climate Action Network Europe in 2018 positioned Ireland in second last place in the EU for action and ambition on climate change.¹⁴

Ireland's draft National Energy and Climate Plan (NECP) submitted to the European Commission in December 2018 does not commit at all to any significant reduction in fossil carbon usage over the next ten years.¹⁵ The absence of a detailed decarbonisation roadmap to date means that Ireland will not meet its 2020 climate and energy targets, and considerable

¹² To illustrate the extent and potential scale of these risks, the Director General of the Environmental Protection Agency, Laura Burke, warned that extreme weather events linked to climate change have 'severely tested the resilience of Ireland's infrastructure; economy, healthcare services and people's wellbeing'. In a similar vein, in late 2018, the Governor of the Central Bank of Ireland cautioned that 'if the pace of transition [to a low carbon economy] is too slow, a sharper adjustment will be ultimately required, posing macroeconomic and financial stability risks.'

¹³ See:

<http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+CRE+20180117+ITEM-008+DOC+XML+V0//EN&language=EN>

¹⁴ See: Climate Action Network Europe 2018 report

(<http://www.caneurope.org/docman/climate-energy-targets/3357-off-target-ranking-of-eu-countries-ambition-and-progress-in-fighting-climate-change/file>) and the Climate Change Performance Index report (<https://germanwatch.org/en/14639>)

¹⁵ See Stop Climate Chaos submission to the first consultation on Ireland's draft National Energy and Climate Plan:

https://www.stopclimatechaos.ie/download/pdf/stop_climate_chaos_coalition_submission_to_dccae_1st_consultation_on_necp.pdf

challenges lie ahead in achieving our current 2030 and long-term obligations.¹⁶ As the Intergovernmental Panel on Climate Change clearly states, “rapid, far-reaching and unprecedented changes in all aspects of society’ are essential to prevent catastrophic climate change.”¹⁷ Failure to implement an economy-wide climate policy framework now will result in a much costlier and sharper transition for Irish society in years to come, especially as the social and economic costs of inaction are magnified.

In November 2018, Minister Bruton announced his intention to develop and implement an All-of-Government Plan across all sectors, with a particular focus on policy implementation and the development of coordinated steps based on clear timelines and designated responsibility across Government Departments.

Stop Climate Chaos believes that, given the backdrop, the development of this Plan provides a once in a generation opportunity to shift Irish climate policy in the right direction, from having a reputation of being a laggard, to being in a position where Ireland is doing, at least, its fair share on climate action. Given the unprecedented call from across Ireland for strong political leadership on climate change, this Plan will be an important litmus test for how serious and committed the Government are to taking adequate policy steps to reduce Ireland’s greenhouse gas emissions in line with our obligations under the Paris Agreement.

In advance of its publication, Stop Climate Chaos has identified five tests, or indicators, to help assess and evaluate whether or not the All-of-Government Plan amounts to credible climate action.

1. Does the Plan acknowledge the scale of the challenge?

The IPCC Special Report on 1.5°C (2018) makes it explicitly clear that on ethical, environmental, economic and political bases, limiting warming to 1.5°C above preindustrial levels should be the goal underpinning all national targets and policies, concluding that net zero emissions is the appropriate emissions target for 2050.¹⁰

The report emphasises the importance of revising upwards the EU’s collective 2030 (currently 40% below 1990 levels) and 2050 (currently 80-95% below 1990 levels) targets. This requirement for increasing, or ratcheting up, ambition has been unequivocally clear since 2015 when it was explicitly integrated into the framework of the Paris Agreement.

The National Policy Position, adopted by the Government in 2014 (pre-Paris Agreement), defines the 2050 mitigation target as at least an 80% reduction in combined annual emissions from energy, transport, and buildings, and an approach to carbon neutrality in agriculture and land-use that doesn’t compromise sustainable food production. This policy approach ring-fences all available national greenhouse gas sinks from land use to be counted as offsets

¹⁶ Regarding the 2020 target, the EPA have indicated that Ireland is at best likely to achieve a 1% reduction rather than the 20% pledged, with emissions projected to continue to rise across all the main polluting sectors, indicating a policy failure on a massive scale. See also: Climate Change Advisory Council. Press release: Ireland is completely off course to achieve its 2020 and 2030 climate change targets. Available at: <http://www.climatecouncil.ie/media/Press%20Release%20AR2018%20WEB.pdf>

¹⁷ Press release: Special Report on Global Warming of 1.5°C (PDF) (Report). Incheon, Republic of Korea: Intergovernmental Panel on Climate Change (IPCC). 8 October 2018. Retrieved 7 October 2018. (Available at: https://www.ipcc.ch/site/assets/uploads/2018/11/pr_181008_P48_spm_en.pdf)

against agriculture related emissions; requiring all other sectors to undertake collective emissions cuts of at least 80% compared to 1990 levels, with no offsetting “flexibility”. The National Policy Position is the cornerstone of Ireland’s response to climate change; it shapes Ireland’s decarbonisation agenda between now and 2050, in addition to Ireland’s contribution to EU effort-sharing regulation. Analysis shows however, that Ireland’s current national policy objective for 2050 is not commensurate with the national and global efforts needed to limit warming to 1.5 °C or well below 2 °C.¹⁸

- ❖ The All-of-Government Plan **needs to acknowledge the growing emissions gap** between the existing policy framework and the objectives of the Paris Agreement.

In order to align Irish climate policy with the latest scientific evidence, Ireland’s medium term target will have to be net zero before 2050,¹⁹ with a shorter-term target of at least halving emissions no later than 2030.

- ❖ The All-of-Government Plan therefore, **must review the adequacy of the existing 2050 objective**, in light of the objectives of the Paris Agreement, including its commitment to global equity, and the IPCC 1.5°C report on Global Warming (2018), which outlined the limited timeframe to act on climate change. The Plan should acknowledge and accept that **Ireland must achieve net-zero emissions by 2050**, and commit to specifying the manner that it proposes to follow to put Ireland on emissions pathway aligned with the objectives of the Paris Agreement.

Ireland’s current mitigation policy – as presented in Ireland’s first National Mitigation Plan (NMP) in 2017– is completely insufficient in helping Ireland to meet its immediate to medium-term climate obligations. This point has been consistently emphasised by national and international authorities, including Ireland’s Climate Change Advisory Council and the European Commission, as well as Minister Bruton himself.²⁰ As it stands, neither the NMP nor the recent Draft NECP will put Ireland on a pathway to achieving its near-term climate targets. This can be attributed to the failure to provide new, near-term targeted and quantifiable climate action measures, with many of the plans’ listed measures involving

¹⁸ Stop Climate Chaos has previously undertaken analysis of this pathway for electricity, building and transport sectors. Ireland’s existing 2050 target requires Ireland to reduce emissions by 5% year-on-year, every year, between now and 2050. Expressed as a carbon budget for the period 2016-2050, this amounts to a limit on combined emissions from all sectors except agriculture of, at most, 653 million tonnes of carbon dioxide. Yet, based on 2016 EPA analysis, emissions are projected to increase to nearly two and a half times that limit, a total of 1585 million tonnes of CO₂ – an overshoot of 932 million tonnes. Current and proposed measures noted in Ireland’s National Mitigation Plan would result in an overshoot of the 2050 objective by almost one billion tonnes of carbon dioxide. The total available carbon budget for 2016-2050 would already be exhausted by 2030 on the current business-as-usual emissions trajectory. These findings emphasise the need and urgency of ambitious mitigation planning. See also McMullin et al: <http://ienets.eeng.dcu.ie/documents/Poster%20for%20Quotas%20%28Gothenburg%29%281%29.pdf?attredirects=0&d=1>

¹⁹ This is also required of the EU as a whole.

²⁰ As part of the 2018 European Semester process, the European Commission noted in its country report on Ireland that the National Mitigation Plan offers ‘few specific new mitigation measures’ and noted that ‘existing climate change mitigation efforts will not enable Ireland to achieve its Europe 2020 climate goals domestically. Only limited progress has been achieved in decarbonising key parts of the economy, mainly in agriculture, road transport and the residential sector.’ See also: <https://www.irishtimes.com/news/environment/threat-of-climate-change-requires-revolution-in-how-welive-says-bruton-1.3689512>

limited or uncertain emissions reductions capability, or simply committing to further planning, research and analysis, while emissions continue at high levels.

- ❖ A key element of aligning Ireland’s near to medium-term targets with the science and the Paris Agreement goals will require a radical revision of our National Mitigation Plan.²¹ The All-of-Government Plan must **trigger and determine the revision of the NMP**, before its five-year review in 2022, and a radically revised NECP by the end of this year, equitably and prudently aligned with the Paris temperature objectives.

Finally, an important part of acknowledging and responding to the scale of the challenge, will require Ireland to translate its rhetorical commitment on *wanting to be a leader* on climate action by actively aligning itself with other member states calling for greater EU ambition in line with the Paris Agreement. To date, 14 European Member States and the European Parliament have publicly stated their support for an increase in the EU’s 2030 target. However, as yet, Ireland has not aligned itself with those Member States calling for greater ambition. To be consistent with the latest science, Ireland must align itself with the countries calling for an increase in the EU’s targets, and support a “net zero” emissions target for the EU well before 2050, and at least 55% reductions at EU level by 2030 (relative to 1990) as recommended in the recent COP24 resolution of the European Parliament Environment Committee.

- ❖ An acknowledgement of the scale of the challenge would translate in the All-of-Government Plan to an **explicit commitment and plan to advocate for greater collective European ambition**.

2. Does the Plan commit to putting the Joint Oireachtas Committee’s recommendations on governance into law by the end of the year?

Ireland’s Environmental Protection Agency has clearly stated that the gap to our existing EU-2030 emission reduction targets is currently set to increase.²² As acknowledged by the Climate Change Advisory Council, Ireland is subsequently far off course to meeting its existing national 2050 emission reduction target. This is despite the adoption of the Climate Action and Low Carbon Development Act 2015, which enshrines the achievement of the national transition objective as a legal obligation for all of government. Clearly, it is not credible to expect that a set of policy recommendations will succeed where existing plans and commitments to date have failed, without major changes to the governance, planning and accountability framework for climate action.

- ❖ In order to drive a sustained agenda of policy development and engagement, it is therefore, essential that the All-of-Government Plan **deliver a planning and accountability framework capable of delivering on the objectives of the Paris Agreement**. This should be set in motion by integrating into the Plan, the enhanced governance and accountability framework recommended by the Joint Oireachtas Committee on Climate Action (Chapter 1 of their Report).

²¹ After five years without any national strategy for reducing emissions, the NMP was published in 2017 under the Climate Action and Low Carbon Development Act 2015.

²² ‘We need to move away from fossil fuels, EPA emissions projections show’. Environmental Protection Agency Press Release, 31st May 2018, Climate Change Advisory Council, Annual Review. July 2018.

- ❖ These recommendations call on the Government to bring forward immediate legislation before the Dáil to amend the Climate Action and Low Carbon Development Act 2015 to incorporate:
 - a new 2050 target of net zero emissions (see *Test 1: Does the Plan acknowledge the scale of the challenge?*),
 - a newly established and strengthened Climate Action Council (and a Standing Committee of both the Houses of the Oireachtas),
 - and the provision for five-yearly carbon budgets consistent with an emissions reduction pathway to 2030 and 2050 that must be voted upon by the Dáil.

A carbon budget approach to policy planning and delivery would obligate persistent, quantifiable progress towards short, medium and long-term targets. Formalising a carbon budget, just like a fiscal budget, obliges a dynamic of negotiation within Government and between departments about how to divide up the constrained emissions “space” between competing priorities. **Without a robust ‘carbon emissions budget’ approach, Government and inter-departmental negotiations on climate measures will never produce a plan to reduce emissions in line with the Paris Agreement.**

Stop Climate Chaos has advocated for some time that the Climate Action and Low Carbon Development Act (2015) should have explicitly incorporated Ireland’s quantified 2050 emissions reductions target, and importantly, obliged the establishment of five yearly ‘carbon budgets’, which decline or reduce steadily on a pathway toward the 2050 objectives. These budget allocations would, in turn, be used as a planning tool to implement policy measures capable of reducing emissions within the budget limit.

- ❖ The All-of-Government Plan must **provide for the preparation of the first carbon budget by the Climate Council**. This must proceed with the urgency specified in Committee report and be presented to the Dáil within 12 months as proposed by the Oireachtas Committee.²³

The implementation and delivery of these recommendations into the All-of-Government Plan would enable sustained and substantial decarbonisation across all sectors of the Irish economy, and help move Ireland closer to fulfilling its commitments under the Paris Agreement.

3. Does the Plan commit to implementing the remaining recommendations from the Joint Oireachtas Committee in full and on time to cut emissions in every sector?

It is imperative that the Plan set out new, detailed measures for each and every sector of the economy that will seek to close growing Ireland’s emissions gap. Stop Climate Chaos takes the view that if the recommendations of the Joint Committee are effectively, expeditiously and comprehensively implemented, Ireland can begin to shed its shameful record as a climate

²³ Enshrining the 2050 emissions reduction target in law combined with the obligation to develop corresponding, steadily declining, five year carbon budgets, was the approach adopted by the UK Parliament and is considered vital to the impact of the 2008 UK Climate Act. These five-year emissions budgets are adopted 12 years in advance, on foot of advice from the UK Climate Change Committee, the equivalent of Ireland’s Climate Change Advisory Council. Notably the Citizens’ Assembly’s first recommendation includes the establishment of 5-year sectoral targets, which would align with such a carbon budget approach.

laggard while providing a powerful democratic model to the international community for forging national climate action. In addition to specific recommendations for immediate changes to climate policy governance and accountability (see Test 2 above), the Report also includes detailed recommendations across key sectors of the economy and society.

These recommendations include:

- A target of 70% of electricity to be renewable by 2030.
- The establishment of a Just Transition Taskforce involving all stakeholders to deliver security and opportunity communities impacted by the move to low carbon economy.
- The establishment of a One-Stop Shop in each county to support citizen and community participation in the low-carbon transition.
- The delivery of public information campaigns by Government, and a more proactive role for broadcasters and Met Éireann.
- An appraisal of the greenhouse gas emissions impact of all new infrastructure projects including those listed in the national development plan, *Project Ireland 2040*.
- Allowing communities to sell micro-generated solar and other renewable energy to the national grid and receive a payment of, at least, the wholesale price for electricity. The lifting of planning restrictions for solar PV on homes, farms and small businesses.
- A target for community owned renewable electricity of 500MW by 2025.
- A re-evaluation by Government, Bord na Móna and the ESB of plans to subsidise biomass to co-fire peat stations.
- The development by the end of 2019, of a new plan for agriculture to align the sector with meeting Ireland's commitments under the Paris Agreement. Reform of the CAP to support the transition to a low-carbon economy within the agri-food sector. It is also recommended that the Government convene a stakeholder forum on agricultural diversification by June 2019.
- The development of a new national land-use plan, a national hedgerow survey, and a new forestry plan, focused on climate mitigation by end 2020. A target of net sequestration for Ireland's peatlands (as opposed to being a source of carbon emissions) by 2050; and the delivery of a funded programme of rehabilitation and restoration of peatlands by the end of this year.
- An urgent needs assessment of what is required to retrofit 45,000 homes a year and explore increasing that to 75,000 houses a year over time. That revised building regulations would set a Nearly Zero Energy Building standard by end 2020. Other recommendations in the building sector include the implementation of a huge programme of retrofitting public buildings, and a ban on new fossil fuel boilers in public buildings
- Implementation of a new plan for the *Smarter Travel: A Sustainable Travel Future* policy in time for Budget 2020, and full implementation of the National Cycle Policy Framework by 2020.

Implementation of these Committee recommendations provides an opportunity for the Government to fulfil the public mandate of the Citizens' Assembly, respond to the unprecedented public concern about climate change and climate inaction, and shift public policy towards decarbonisation. In addition, the Committee's recommendations provide the necessary political impetus and policy framework to help enable Ireland move beyond a business-as-usual approach to tackling climate change.

- ❖ A key test for the All-of-Government Plan is whether or not it **explicitly accepts and fulfils the call to action from the Citizens’ Assembly and the cross-party mandate from the Joint Oireachtas Committee** by:
 - adopting, in full, the sector-specific recommendations of the Committee’s report, and
 - detailing a plan to ensure the expeditious implementation of these recommendations in line with the timelines set by the Committee.

The Plan must provide the **sufficient level of policy detail** around these recommendations to allow the EPA to revise its emissions projections. According to the EPA, its 2018 emission projections for Ireland do not include the impact of new climate mitigation policies and measures that formed part of the National Development Plan or the full impact of all policies listed in Ireland’s National Mitigation Plan. The agency notes that technical data associated with such policies and measures needs to be worked out by lead Government Departments and Agencies for inclusion in EPA emissions projections to reflect their full mitigating impact.²⁴

- ❖ **Policy measures included in the Plan must be sufficiently detailed** and their carbon impact quantified to allow the EPA to update its emissions projections scenarios (i.e., its *With Additional Measures* scenario) for between now until 2035, and to provide a solid framework for the development of future mitigation planning, including Ireland’s National Energy and Climate Plan and National Long-term Strategy.²⁵

Previous mitigation planning frameworks, particularly Ireland’s National Mitigation Plan presented a narrow framing of climate action measures with a cautious, over-focus on the cost-effectiveness of measures. The overwhelming message in the National Mitigation Plan centred on climate action as undesirable, costly and disruptive to economic plans. In fact, it is *delayed* climate action that is costly and disruptive to Ireland’s long-term economic future.

- ❖ **The All-of-Government Plan must present a compelling vision for a decarbonised Ireland** that, while it accepts and embraces the climate challenge, also ensures that social progress, equity, and environmental sustainability are at the centre of this vision. This will require presenting a pragmatic but definite, positive vision around climate action measures.

²⁴ See:

https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2017-2035/EPA_2018_GHG_Emissions_Projections_Summary_Report.pdf

²⁵ According to the Environmental Protection Agency (2018): “2018 emission projections do not include the impact of new climate mitigation policies and measures that formed part of the recently announced National Development Plan or the full impact of all policies and measures included in Ireland’s National Mitigation Plan. Technical data associated with such policies and measures will need to be worked out by lead Government Departments and Agencies for inclusion in EPA emissions projections to reflect their mitigating impact, where relevant. It is anticipated that 2019 emission projections will include additional impact of more recently announced policies and measures”

4. Does the Plan "do the math"?

For any and all of these climate measures to be really effective, the Plan must determine an overall whole-of-economy carbon budget that is aligned with closing the gap between Ireland's existing emissions pathway and the pathway Ireland must be on to comply with international obligations. In other words, this budget should confirm how much carbon Ireland can realistically emit.

The Joint Oireachtas Committee recommended the provision for five-yearly carbon budgets consistent with an emissions reduction pathway to 2030 and 2050 that must be voted upon by the Dáil (see above *Test 2: Does the Plan commit to putting the Joint Oireachtas...*). For these budgets to be effective planning tools to allow for sustained decarbonisation across the Irish economy, it is **essential that the emissions reduction impact of specific policy measures is quantified nationally and by sector.**

- ❖ The All-of-Government Plan should include:
 - a carbon budget scenario (an overall whole-of-economy budget and within that, indicative sector specific budgets) based on Ireland's current 2030 and 2050 target objectives.
 - Scenarios based on a revised, updated 2030 target and net zero emissions 2050 objective.
 - Acknowledgment within the Plan of whether or not these scenarios are aligned with the objectives of the Paris Agreement and with the latest IPCC science will form an important part of the scenario planning process.

- ❖ **The Plan must quantify the emissions reduction impact for each policy measure across all sectors, and benchmark sector-specific budget impacts against an overall whole-of-economy carbon budget based on current and updated 2030 and 2050 targets.**²⁶

5. Does the Plan clarify how the Government will devise the next set of actions?

While the recommendations from the Joint Oireachtas Committee provide a baseline of ambition for strengthening Irish climate policy, implementation will not reduce the gap between our current emissions trajectory and the emissions pathway required under the Paris Agreement. This is particularly evident in the absence of quantified emissions reduction impacts.

²⁶ In their briefing on the direction of Irish climate policy, *Back on Track* (2019), An Taisce recommend the commissioning of an urgent independent expert review of the *adequacy* of the national mitigation objectives currently stated in the National Policy Position, with particular regard to the Paris Agreement (2015), including its commitment to global equity, the IPCC Special Report on Global Warming of 1.5°C (2018), and the forthcoming IPCC Special Report on Climate Change and Land (2019). This review process should include comprehensive public participation, informed by the model of the Citizens' Assembly. The review should be completed and a fully revised National Policy Position presented to the Oireachtas **no later than June 2020**. (See:

<http://www.antaisce.org/publications/getting-ireland%E2%80%99s-climate-action-%E2%80%9Cback-on-track%E2%80%9D-what-%E2%80%8B-exactly-%E2%80%8B-does-it-mean>)

- ❖ The All-of-Government Plan must **acknowledge that the framework of recommendations presented by the Joint Oireachtas Committee will need to be significantly built upon** resolutely and consistently to significantly reduce emissions within the diminishing time-frame available.
- ❖ It is imperative that the Plan **set out new, additional measures for each and every sector of the economy that will seek to close growing Ireland’s emissions gap**. A consequence of this will require that the Plan **outline a process and timeline** for adopting additional policy measures.

According to the governance of the energy union and climate action rules, Ireland is required to submit to the European Commission, a final NECP by the end of 2019, and is obliged to contribute a Long-Term Strategy (LTS) in January 2020. These processes will outline Ireland’s arrangements and plans for emissions reductions between 2020 and 2030 (outlined in the NECP), and beyond to 2050 (presented in the LTS).

Research published by the European Climate Foundation found that Ireland’s draft NECP rated poorly on ambition, level of detail of the policies and measures described, and the quality and inclusiveness of the drafting process.²⁷ The research concluded that the draft NECP did not align Ireland with its current 2030 target, or with a net zero vision for 2050. The draft document also failed to provide any reference to its integration and coordination with existing policy frameworks, including the NMP and LTS.

- ❖ **The All-of-Government Plan should specify how it will be fully reflected and integrated into the finalisation and delivery of the NECP, the LTS, and future National Mitigation Plans.**

Delivering the Revolution in how we live in the All-of-Government Plan

A stable climate is a prerequisite for all other social, economic and political goals. Hence, the imperative for the State to protect its citizens from climate disruption requires our political leaders to put in place, *without delay*, ambitious, coordinated and equitable policies that lead us towards full decarbonisation. The new All-of-Government Plan could be a once in a generation opportunity to put Ireland on the path to implementing the Paris Agreement.

In his public response to the level of support for Green Party candidates in recent local and European elections, Taoiseach Leo Varadkar said that the Government had “got that message” and would accelerate climate action.²⁸ The emissions pathway that this Plan will set us on for the years ahead will be a key reflection of how serious the Government is about tackling climate change. Delivering a Plan which puts us on a Paris-aligned pathway will show that indeed, the Government has “got the message”.

Stop Climate Chaos Coalition

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²⁷ See the Stop Climate Chaos press release on the research and link to the report here:

<https://www.stopclimatechaos.ie/news/2019/05/16/european-study-scores-draft-government-climate-pla/>

²⁸ See:

<https://www.irishtimes.com/news/politics/elections-2019-public-want-more-action-on-climate-says-varadkar-1.3904756>