Professor John Fitzgerald,
Climate Change Advisory Council,
Environmental Protection Agency,
Richview, Clonskeagh,
Dublin 14

17th September 2019

Re: Request from Government for advice on offshore exploration

Dear Chair,

I am writing to you on behalf of the Stop Climate Chaos Coalition in relation to the request from the Department of Communications, Climate Action and the Environment for advice from the Council on policy related to offshore exploration.[1] We welcome your intention to bring the matter to the Council's meeting on the 19th September and to follow-up with advice and recommendations to the Government thereafter.

As you are aware, the issue of offshore fossil fuel exploration and extraction has generated much political and public debate in Ireland in recent months. This debate has often been undermined by misinformation and misleading claims about the role of fossil fuels in achieving Ireland's obligations under the Paris Agreement, with negative implications for public and political understanding of the low carbon direction Ireland needs to take.

Science is now clearly telling us that a rapid and fair transition to a fully decarbonised economy is urgently required. The transition to a zero-carbon economy must be guided by the need to ensure a just and equitable distribution of burdens and benefits, globally and domestically, and above all, the latest scientific evidence and assessment.

As a Coalition with a particular focus on the importance of timely and robust mitigation action at national level, we wish to refer you to, in advance of the meeting on September 19th, the evidence that clearly shows the considerable risks associated with opening new fossil fuel reserves, the need for a low carbon transition without natural gas, and the mitigation benefits of targeting supply side policies. In preparing the Council's own analysis and recommendations to the Government on exploration policy, we urge you to review and consider the wide range of scientific and economic evidence and analysis available on this issue, and in your analysis include detailed answers to the following questions:

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Is continued offshore fossil fuel exploration and extraction compatible with the Paris Agreement?

There is widespread scientific consensus that on-going investment in fossil fuel exploration, extraction, and delivery infrastructure is incompatible with global and domestic climate objectives.[2] In their testimony to the Committee on Climate Action in November 2018, IPCC authors agreed that measures to prevent the opening up of new reserves would serve the goal of limiting warming to the 1.5 °C limit.[3] Latest research shows that not only do historical emissions from existing energy infrastructure already jeopardize the 1.5 °C climate objective, but that to keep within this temperature limit, existing infrastructure may need to be retired early.[4] In light of these scenarios, the key recommendations are that governments should not grant new permits for fossil fuel extraction, and that a managed decline in such infrastructure be put in place. Delaying mitigation until 2030 considerably minimises the likelihood of attaining 1.5 °C, even if the current rate of retirement of existing fossil fuel infrastructure is accelerated.[5] Arguments that increased investment in fossil fuel capacity is required even under ambitious scenarios are based on ambitious assumptions in relation to Carbon Capture and Storage Technology, and conservative assumptions about the competitiveness of renewables combined with storage.[6]

Does increasing Ireland's reliance on gas increase or undermine long-term energy security?

We urge you to review and consider the latest scientific assessments that clearly show that in addition to the climate risks, investment in natural gas raises serious questions of long-term financial viability and stranded asset risk.

Anderson and Broderick (2017) emphasise that all fossil fuels – including natural gas – have no role in an EU 2°C energy system beyond 2035.[7] Any new gas infrastructure built between now and 2035 risk becoming stranded assets, amplifying the economic and environmental risks associated with fossil fuel lock-in. Clearly shown in a number of recent assessments, this risk is amplified as the falling costs associated with clean energy undermine gas-fired generation economics and threaten to force existing or proposed new gas plants into early retirement (see for example, Nace et al., 2019; Dyson et al., 2019; Telpin et al., 2019).[8]

Similar conclusions are reached by McGlade et al. (2018) who, in their assessment of UK trajectories, also show that investing in new gas infrastructure risks locking in fossil fuels, and necessitates the large-scale deployment of carbon capture and storage. Investments in new infrastructure, especially those designed to accommodate imported fracked gas will result in emissions levels not consistent with the scale of reductions required.[9]

Pertaining to the Irish situation, an evaluation commissioned by this Coalition (McMullin et al. 2018), found that scaling up dependency on a (limited and rapidly

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depleting) natural gas supply would present very serious security-of-supply concerns for Ireland's energy system while simultaneously inhibiting the necessary scale and speed of decarbonisation of the energy system.[10] Oil Change International echoes similar concerns in their assessment of the role of gas in achieving Ireland's climate goals.[11]

All of these studies and assessments point to a pathway where what is required is an urgent programme to phase out existing natural gas and other fossil fuel use as an imperative of any scientifically informed and equity-based policies designed to deliver on the Paris Agreement. The logical alternative proposed and supported by all these studies is that investment is prioritised in renewable energy, storage, demand response and efficiency ahead of more gas capacity. Although obvious, it is worth explicitly noting that the biggest threat to energy security is inadequate and delayed climate change mitigation. For objective analysis of the systemic risks presented by climate change and an abrupt, delayed transition, see *Too Late, Too Sudden*, by the Advisory Committee to the European Systemic Risk Board.[12] This assessment highlights that the international community, including the European Union, are currently on track for a late, abrupt transition with a 'hard landing', impacting both energy security and financial stability.

What benefits could complementing demand side policies with supply-side mitigation policies bring?

Your consideration should also include the emerging body of research that emphasises the rationale and benefits for targeting supply-side mitigation policies (Lazarus et al. 2015, 2018; Seto et al. 2016; Green and Denniss 2018).[13] These studies show that targeting supply-side policies, curbing fossil fuel extraction and addressing carbon lock-in, can have multiple benefits. These benefits include allowing greater emissions reductions at a similar or lower cost to demand-side policies, reducing the risk of carbon lock-in while making it easier for renewable alternatives to compete with fossil fuels, and weakening the carbon entanglement that prevents governments from promoting strong, ambitious climate policies. Ceasing the issuing of permits can increase ambition and the effectiveness of climate policies. Political advantages, also highlighted in this body of research, include the superior potential to mobilise public support for supply-side policies, the conduciveness of supply-side policies to international policy cooperation, and the potential to bring different segments of the fossil fuel industry into a coalition supportive of such policies.

Allocating a diminishing carbon budget on equitable terms

The political and moral question of whether Ireland, a rich economy with abundant as yet unexploited renewable energy potential, should open up new reserves, and therefore new and additional sources of global emissions, must be given attention. Ireland's decision on its licensing regime and its choice of transition policies do not take place in a vacuum. Others will respond to the decisions the Irish State will take in

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this regard. If Ireland chooses to prioritise short term self-interest over the global good by explicitly choosing to continue and seek to grow fossil fuel exploration and extraction, it condones and encourages other States to do the same.

Any recommendations on climate policy must take into account the equity implications of extraction-side policies for a wealthy, high emitting country like Ireland. This raises important questions, according to Kartha et al. (2018), about who can continue to use a quickly diminishing global carbon budget, and how can the remaining extraction and sharing the costs of foregoing extraction be equitably allocated.[14] Also included is a question of the fairness of allowing some countries to free-ride, through continued exploration and extraction, on the mitigation efforts of others. To manage the transition equitably demands that developed countries, that have a better capacity to adjust and viable alternatives to meet their economic needs, rapidly curb extraction.

In a time where there are profound social, environmental and economic costs associated with the failure to take adequate and timely action, costs which are all too often inadequately taken into account when looking at proposed actions. We recognise the challenges that exist when attempting to bridge science with policy; however, we regard this request from the Government to the Climate Advisory Council as providing a key opportunity to bridge that gap. It is within this context that we urge you to consider the evidence and questions set out here when compiling your analysis and formalising your recommendations to the Government.

Yours sincerely,
Catherine Devitt.

Head of Policy,
Stop Climate Chaos Coalition.

[1] The members of Stop Climate Chaos are: Afri, BirdWatch Ireland, Christian Aid Ireland, Comhlámh, Community Workers' Cooperative, Concern, Cultivate, Climate Case Ireland, Dublin Friends of the Earth, Eco Congregation Ireland, ECO UNESCO, Feasta, Friends of the Irish Environment, Friends of the Earth, Gorta-Self Help Africa, Just Forests, Jesuit Centre for Faith and Justice, Kimmage Development Studies Centre, Latin America Solidarity Centre (LASC), Liberia Solidarity Group, Methodist Church of Ireland – Council of Social Responsibility, Mountmellick Environmental Group (MEG), National Youth Council of Ireland, Oxfam Ireland, People's Climate Ireland, Presentation Ireland, Sustain West Cork, Trócaire, An Taisce, VITA and V.O.I.C.E.

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