

**Submission to the Department of Communications, Climate Action
and Environment on the draft National Mitigation Plan (NMP)**

Summary

Stop Climate Chaos and the Environmental Pillar

April 2017



Environmental Pillar
working for a sustainable future



1 Does the NMP put forward a Plan for delivering Ireland’s climate action commitments?

The Environmental Protection Agency has [explicitly stated](#) that transformational change is urgently required across the entire economy and society to make the shift towards decarbonisation. As [advised](#) by the Climate Change Advisory Council (CCAC), long-term planning and a stable policy framework comprising concrete policies is required. The NMP should outline how Ireland will achieve its 2020 and 2030 climate and energy targets, and [outline the roadmap](#) required for Ireland to reach its 2050 national objective.

Overall, it is the view of Stop Climate Chaos (SCC) and the Environmental Pillar¹ that the draft Plan does not achieve these objectives.¹ It fails to:

- reflect any increase in ambition to meet either Ireland’s existing EU targets or to ensure Ireland does its fair share of the global effort to deliver on the temperature limits adopted in the [Paris Agreement](#), and;
- fulfil the task ascribed to it under the [Climate Action and Low Carbon Development Act \(2015\)](#).²

As intended in the Climate Act (2015), the draft Plan is required to set the parameters for other Ministers to frame their sectoral mitigation plans. There is no indication of the manner in which this is to be achieved or what support will be provided to individual Departments to enable them to comply with the overall national mitigation framework.

Also intended under the Climate Act (2015), climate justice is one of the principles that climate policy measures must have regard to. We are concerned with how the draft Plan frames climate action as costly and undesirable. To be just and adequate, the Plan must integrate analysis of the implications of the local and global human costs of inaction, the costs of delayed mitigation action and the costs of non-compliance with EU targets, the wider systemic risks of inaction, and the cost of failing to capitalise on the opportunities of an ambitious pathway to decarbonisation.

¹ The full submission is available at:

² The Act stipulates that the NMP must specify ‘*the manner in which it is proposed to achieve the national transition objective*’ and ‘*the policy measures that... would be required... for furthering the achievement of the national transition objective*’. The NMP must also ‘*take into account any existing obligation of the State under the law of the European Union or any international agreement*’, and ‘*specify the mitigation policy measures to be adopted by the Ministers of the Government...*’.

There are four targets or benchmarks which determine what Ireland's *fair share* of action is:

1. Ireland's 2020 target

Ireland's 2020 climate target is a 20% reduction in combined emissions from transport, buildings and agriculture below 2005 levels.³ The draft Plan expresses the 2020 target as a carbon budget of 338 MtCO₂e for 2013-2020. Ireland (alongside only a small number of other EU countries) is set to miss its 2020 targets: emissions will be, at best, 6% below 2005 levels. The EPA projects total non-ETS emissions for the period will exceed 350 MtCO₂e, **an emissions gap of 12 MtCO₂**. The draft Plan fails to specify how the Government intends to close this emissions gap to target. This is despite the significant local and global human costs and the considerable financial penalties Ireland may face over the coming decade to 2030.

2. Ireland's proposed 2030 target

Ireland's provisional 2030 target is a 30% cut in the annual aggregate emissions of the transport, buildings and agriculture sectors. The carbon budget for the transport, buildings and agriculture sectors is approximately 383 MtCO₂e for 2021 to 2030. The EPA [project](#) that Ireland will produce almost 456 MtCO₂e over the same period; this leaves an emissions gap of 73 million tonnes (a 19% overshoot on the carbon budget). The draft Plan fails to specify how the Government intends to close this emissions gap to target.

3. Ireland's 2050 National Transition Objective

The National Transition Objective for 2050 is an 80% reduction in combined emissions from energy, transport and buildings and an approach to carbon neutrality in agriculture by 2050. Ireland's 2050 objective ring-fences all available national greenhouse gas sinks from land use to be counted as offsets against agriculture-related emissions. This requires all other sectors to undertake absolute emissions cuts of at least 80% compared to 1990 levels, with no offsetting "flexibility".

The 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*,

³ Emissions from the energy sector are covered by a European-wide Emissions Trading Scheme (ETS), however Ireland does have national targets to increase renewable energy in electricity, transport and heat.

653 million tonnes of carbon dioxide. Based on current 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). As is, the current draft Plan would therefore 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.

4. Ireland's obligations under the Paris Agreement

The Paris Agreement commits to holding the increase in the global average temperature rise to *'well below 2°C above pre-industrial levels and pursuing efforts to limit temperature increase to 1.5°C above pre-industrial levels'*. The [Climate Fair Shares model](#) estimates that Ireland's equitable contribution would be a reduction in emissions by 53%-63% below 1990 levels by 2025. This would limit annual emissions in 2025 to between 20-26 million tonnes of CO₂e, compared to EPA projections of around 63 MtCO₂e. This represents an emissions *gap* of around 40 million tonnes per annum already in 2025. Currently, the draft Plan implies a plan to emit three times the annual emissions of Ireland's fair share of global effort under the Paris Agreement by 2025. Within the limits indicated by the Agreement, Ireland's entire annual carbon budget would be exhausted by emissions from the agricultural sector alone by 2025.

Recommendations for delivering Ireland's climate action commitments

It is the view of SCC and the Environmental Pillar that the Plan as a whole should not be considered an adequate template for ambitious, fair climate action and effective national mitigation policy planning. A new Plan must be brought forward which should aim to:

1. Acknowledge the implications of any projected failure by Ireland to meet its fair share of the global effort under the Paris Agreement and how it intends to address this shortfall.
2. Explicitly evaluate the direct costs of inaction, the rising costs if action is delayed, the opportunity costs of inaction and the systemic risks associated with inaction. Moreover, we recommend that the building of technical and economic advisory capacity should include the expansion of the current narrow 'cost-effectiveness' analysis, as a matter of priority, to integrate analysis on an ongoing basis of the implications of all of the costs and risks outlined.

3. Present a compelling vision for a decarbonised Ireland, accepting and embracing the challenge and making the decarbonisation agenda an agenda for social progress and equity, prosperity and environmental sustainability. This will require fostering a pragmatic but positive narrative (based on ‘how to’ rather than ‘how much’) around climate action if the public and private sector are expected to support the measures needed.
4. Outline how the Government intends to close the gap between current projections and Ireland’s 2020 and 2030 EU targets, while being consistent with the national 2050 objective of an 80% cut in net annual GHG emissions. The mitigation plan must also demonstrate Ireland’s intention and capacity to enhance climate action in line with its commitments under the Paris Agreement. It will also need to account for the implications of the ambition of that plan for achievement of Ireland’s 2020, 2030 and 2050 climate commitments.
5. Contain an overall carbon budget for the achievement of the National Transition Objective by 2050. This will help provide a useful guide for policy development and implementation. Within that overall budget, the Plan should also determine a carbon budget for the five year timeframe it covers and proceed to allocate available emissions and reduction efforts between sectors to achieve the continuous, substantial and sustained decarbonisation that is required economy wide. As part of this, the NMP needs to set out detailed objectives and intended policy measures to be adopted to deliver on these objectives for at least a five year period.

The remainder of this summary assesses the draft Plan in relation to specific sectors.

2 Does the NMP commence the phase out of fossil fuels?

The [overall contribution](#) from renewable energy in Ireland remains low. This is despite Ireland having an abundance of renewable energy, with the potential to become a [major beneficiary](#) of the global shift towards carbon-free economies. The draft NMP acknowledges the need to diversify Ireland’s renewable sector and to phase out energy from peat and coal. However, there is no clear specific outline provided on *how* and *when* these objectives will be achieved:

- no new options are presented for decarbonising electricity generation,
- no fixed decision is made regarding the future of Moneypoint, Ireland’s coal-fired power station,⁴

⁴ The Energy White Paper (2015) contains a commitment to make key decisions on the future of the Moneypoint station before 2020. No decision has been made.

- no measures are included regarding the termination of peat harvesting for electricity generation before 2030.

Commitment to the preparation of options for the removal of financial subsidies to fossil fuel energy in the draft Plan is welcome. Subsidies should be redirected to investments in renewable energy and low carbon development, training and employment and sustainable, progressive energy poverty alleviation.

There is considerable need however, for a plan on how to respond to the social and economic needs of communities affected by the phasing out of fossil fuel-related jobs. This plan could be driven by a cross-agency task force supported by political initiative and engagement and charged with the responsibility of identifying alternative, good quality, sustainable job opportunities.

We welcomed the passage of the Fossil Fuel Divestment Bill to Third Stage in January 2017. This was an important signal of recognition by a majority in the Oireachtas of the evidence that the bulk of remaining fossil fuel reserves will need to remain unburned, and there is an imperative to phase out fossil fuels as soon as possible.

Recommendations for the NMP on the phasing out of fossil fuels

1. We acknowledge the amendment in the accompanying [SEA Environmental Report](#) to the NMP that a study be undertaken in the next two years to provide a roadmap and inform the next NMP concerning the future of Moneypoint. From a climate action perspective, it is necessary that clarity be provided that the objective of this roadmap must be to move Moneypoint away from coal burning.
2. We support the [recommendation](#) from the CCAC for the termination of peat firing of power stations as an obvious step in shifting policy towards decarbonisation and away from fossil fuel dependence.⁵ The NMP should also include a ban on future exploration for fossil fuels in Ireland (including territorial waters).
3. We support the recommendation from the IIEA ([2017](#)) that individual climate policies be socially and rurally proofed and that Government commit to proactively manage the transition for affected communities.
4. Divesting the Ireland Strategic Investment Fund of fossil fuel assets and the phase-out of fossil fuel subsidies should be advanced swiftly as critical steps to respond to the

⁵ These stations are highly inefficient, providing just 9% of Ireland's electricity but producing 27% of emissions from electricity generation. Moreover, peat firing is subsidised to the tune of €120 million a year.

commitment in Article 2 of the Paris Climate Agreement to align finance flows with the decarbonisation agenda, and as important statements of intent on Ireland's commitment to building a fossil free future.

3 Does the Plan ramp up renewable energy and kick-start community ownership?

The [2015 White Paper](#) on energy acknowledges the importance of citizen and community participation in transitioning our energy system to zero carbon. Facilitating community ownership of renewable projects, as is done in other European countries, can help achieve public acceptance of renewable energy projects and climate policy more generally.

We have concerns that the draft Plan's current approach of '*engagement, participation and acceptance*' suggests a top-down process that if used as the sole method of engagement will minimise social acceptance of policy measures, and reduce the important role that communities play in the transition to a low carbon society. While the draft Plan acknowledges *potential support* for micro-generation, there is no clear indication of any national strategic plan to establish a framework for community energy ownership in Ireland.

Solar power offers a unique opportunity to provide diversity in electricity generation and for citizens and communities to participate in and take ownership of the renewable transition. Without a guaranteed payment for micro-generation including solar, however, this will not happen in Ireland.

Recommendations for the NMP on ramping up renewable energy

1. We recommend that a fair price be provided for solar electricity supplied to the grid, the introduction of measures to enable community-led projects such as simplifying grid access, and the implementation of a Danish-style shared ownership scheme mandating that developer-led projects offer 20% of the equity to local communities.

4 Does the NMP realign transport investment to reduce emissions?

There is an [increasing urgency](#) to focus on decarbonising Ireland's transport sector. Total annual transport emissions increased by 4% in 2015 alone, have doubled overall since 1990, and strong growth in emissions from transport is projected over coming years. Adopted in 2009, the national policy on transport [Smarter Travel](#) included the following targets to be achieved by 2020:

- The transport sector making a meaningful contribution to Ireland's EU climate change commitments by reducing greenhouse gas emissions;
- 500,000 more people taking alternative means to commute to work so that the total share of commuting by car drops from 65% to 45%;
- Walking, cycling and public transport rising to 55% of total commuter journeys to work;
- The total kilometres travelled by car not increasing significantly from 2009 levels.

None of these targets are being met, and the draft Plan fails to address how the objectives of the *Smarter Travel* policy will be achieved.

Recommendations for the NMP on transport

1. To achieve the objectives of Smarter Travel, the NMP must rebalance existing funding away from road infrastructure and prioritise investment in walking, utility cycling and clean, sustainable public transport.⁶
2. The NMP should commit in the new national planning framework to facilitating low-carbon mobility, particularly by requiring (as a licensing condition) fully integrated transport *networks* across public and private sectors, offering seamless connectivity to passengers. This would specifically require zone, distance, or time-based fares spanning arbitrary transfers between modes and transport operators.
3. The NMP should support the conversion of public transport vehicles to sustainable energy sources - cleaner, low emission public transport is a vital component of a low carbon transport future. For public transport, conversion to electric power makes sense, with inbuilt air quality improvements. Other sustainable options may include the use of bio-methane – an already prevalent source of fuel in a number of European cities.

5 Does the NMP put agriculture on a path to carbon neutrality?

The CCAC [recommend](#) that the agriculture and land-use sector will need to determine in the NMP, a pathway and timeline to achieving its 2050 objective. This pathway needs to encompass significant actions to reduce emissions and increase carbon uptake in a sustainable manner.

We [have argued](#) that Ireland's current agriculture and land-use policy is neither 'climate-smart' nor sustainable. Ireland should be supporting farmers to transition away from ruminant production to a more sustainable model of farming, by encouraging High Nature Value farming,

⁶ The Smarter Travel Initiative has been allocated €100m funding under the Capital Plan Building on Recovery: Infrastructure and Capital Investment 2016-2021. The overall total transport budget is approximately €10 Billion.

incentivising low carbon farming and promoting healthier and less ecologically damaging human diets.

The draft Plan refers to the use of forestry and bio-energy as suggested offsets for agriculture-related greenhouse gases. The [use of land sinks](#) to offset agricultural emissions will achieve only a small fraction of the required emissions reduction as such land sequestration is impermanent and highly uncertain.⁷

Peatland restoration as a mitigation measure is surprisingly omitted from the draft Plan. If adequately managed, sequestered carbon in peatlands could provide a cheap mitigation measure as they store carbon and continue to absorb CO₂ as they expand. For this potential to be realised, stronger enforcement to protect peatlands, rewetting and restoration, and using alternative non-peat sources for energy production is required.

Recommendations for the NMP on agriculture and land use

1. To sufficiently off-set agricultural emissions, the NMP must outline what an environmentally and socially sustainable level of carbon sink is, while giving considerations to biodiversity, recreation and agriculture.
2. Restoring Ireland's peatlands as a means of emissions reduction and carbon storage is an obvious measure which should be included in the final plan. This can be achieved using target-driven restoration objectives.

6 Conclusion

We contend that the draft Plan cannot be considered acceptable – in terms of ambition, planning and approach towards meeting Ireland's national and international climate commitments, in terms of the framing of climate action, and in relation to the task assigned to it under Ireland's Climate Act (2015).

Addressing the gaps and weaknesses identified in this submission can go a significant way to providing a more robust basis for effective and equitable climate policy planning, implementation and review. However, the tools alone will not be enough. Political and

⁷ In early 2017, Ireland was criticised by the European climate action network, [Carbon Market Watch](#), for advocating for the use of forestry offsets to meet effort-sharing targets. The network recommends that Ireland advocate for reducing or removing the option to use forestry offsets to meet its targets.

departmental leadership is urgently needed to shift the public and political discourse currently reflected in the draft Plan to one that is energetic, ambitious and urgent on climate action.

ⁱ Stop Climate Chaos (SCC) is a coalition of 31 civil society organisations campaigning to ensure Ireland plays its part in preventing runaway climate change. It was launched in 2007 and is the largest network of organisations campaigning for action on climate change in Ireland. Its membership includes development, environmental, youth and faith-based organisations.

The Environmental Pillar is made up of 28 national environmental non-governmental organisations (NGOs) that work together to represent the views of the Irish environmental sector. The Environmental Pillar creates and promotes policies that advance sustainable development and acts as an advocacy coalition promoting sustainable solutions in areas such as climate change, biodiversity, tree-cover, resource efficiency, transport, planning and water.