

The new Climate Action Plan: Will it lead to a revolution in how we live?

Report from the Stop Climate Chaos Coalition and the Environmental Pillar on their analysis of the Climate Action Plan

July 2019



Contents

Summary	2
Introduction.....	4
A welcome commitment to implement the Committee’s recommendations on governance	6
The Plan’s failure to acknowledge the scale and urgency of the climate challenge.....	8
A missed opportunity to build on the recommendations of the Joint Oireachtas Committee on Climate Action	11
The absence of explicit steps linking domestic policy to European climate governance ..	15
What will really help deliver the revolution in how we live?	16

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Summary

- Current policies and measures on climate change are not working. Ireland is far off course to achieving its 2020 climate and energy targets, and it must significantly increase the pace of climate action if it intends to substantially reduce emissions across all sectors in line with 2030 and long-term obligations.
- This report “*The new Climate Action Plan: Will it lead to a revolution in how we live?*” draws on a detailed assessment by the Stop Climate Chaos Coalition and the Environmental Pillar of the Government’s new Climate Action Plan (published June 17th, 2019).
- We welcome proposals in the Plan for improved governance structures and mechanisms to ensure delivery and oversight of climate measures. An important litmus test for how genuinely committed the Government is to the merits of this Plan will be the urgency with which these governance reforms are put into law.
- While the decision in the Plan to enshrine into law the *current* 2050 target is a positive move, the EUs and Ireland’s 2050 targets are not yet Paris-aligned. EU and UN processes require us to ratchet up our ambition accordingly in the coming months. Moreover, the Government will need to specify in detail the process it proposes to follow to put Ireland’s actual emissions on a pathway aligned with the Paris Agreement.
- Limiting global temperature increase in line with the objectives of the Paris Agreement requires rapid, deep and permanent decarbonisation and enhanced biosphere resilience. A key failure of the Plan is the lack of any real commitment to this scale of emissions reductions over the coming decade, or an acknowledgement of the risks associated with a delayed, or slower transition as a result. The Plan proposes to reduce emissions by 2% a year from now to 2030 and 7% or more a year thereafter. That is not an acceptable or effective pathway.
- We have considerable concerns with the use of Marginal Abatement Cost Curve (MACC) as the key mitigation planning tool in the Plan. By focusing on the cheapest mitigation options to reach short term targets, the Government runs the risk of delaying investments that would deliver more cost-effective long term reductions, instead over-investing in measures with limited mitigation potential and locking us into carbon-intensive infrastructure. This tool does not allow for analysis of the distributional costs of mitigation measures, the implementation barriers on these options or the implications of behavioural failures or lack of resources, the external environmental costs, or co-benefits.

- The Plan ignores, does not adopt, or weakens some of the recommendations and timelines proposed for policy delivery by the Joint Oireachtas Committee on Climate Action in their landmark cross-party report in March 2019. In our assessment below, we look specifically at the transport sector, agriculture, land use and forestry, a just transition, and in relation to buildings, as examples where this is the case.
- Consequently, we see a significant missed opportunity for Government to i) fulfil the public mandate of the Citizens’ Assembly and respond to the unprecedented public concern about climate change, ii) respect the cross-party support and political impetus that now exists to enable Ireland move beyond a business-as-usual approach to tackling climate change, and iii) drive forward sustained emissions reductions.
- We are concerned by the lack of specific, detailed reference in how the Plan will be fully reflected, and its weaknesses addressed, in the final draft of National Energy and Climate Plan, which Ireland must finalise and submit to the European Commission before the end of 2019. We urge the Government to conduct its proposed evaluation of a net zero target for Ireland before the end of 2019 as part of its broader commitment to the European Union Long-Term Strategy (LTS).
- We urge the Government to:
 - ensure that the preparation of the first carbon budget by the Climate Council proceeds with the urgency specified in the JOCCA report and is presented within 12 months as proposed;
 - commit to bringing legislation (Heads of Bill) before the Dáil immediately after the 2019 summer recess to enshrine in law the enhanced policy governance and accountability framework recommended by the JOCCA and included in the Plan;
 - commit to building upon the full package of JOCCA recommendations through the retained flexibility in the proposed governance arrangements;
 - specify how it intends to fully reflect the Plan’s commitments, and address the weaknesses identified here, in the final draft of the National Energy and Climate Plan and in the Long Term Strategy.
- We conclude by emphasising that the Government’s commitment to climate action and the measures outlined in the Plan lack any real credibility if the Government is willing to support and permit the continued exploration for fossil fuels off the Irish coast. Specifically, the decision by Government to block further debate on the Climate Emergency Measures Bill for the duration of this Dáil by invoking the “money message” procedure is an ill-founded and undemocratic abuse of parliamentary procedure. Without policy coherence and equity across all economic sectors, emissions reduction efforts are futile and inequity will be enshrined in a policy framework that requires fairness and justice.

Introduction

In November 2018, the Minister for Communications, Climate Action and the Environment, Richard Bruton, announced his intention to implement a new Climate Action Plan, modelled on the Action Plan for Jobs, with actions across all sectors and a particular focus on implementation of policy based on clear timelines and designated responsibility across government departments. This eagerly awaited document was published on June 17th 2019, with initial reactions citing the Plan as representing a step-change in climate action. Three recent milestones form the broader policy trajectory in which this Plan was published:

- In April 2018, the Citizens' Assembly published a list of 13 high-level recommendations on how the State can make Ireland a leader in tackling climate change.
- In March 2019, the Joint Oireachtas Committee on Climate Action (JOCCA), which the Citizens' Assembly on climate change gave rise to, completed their intense cross-party scrutiny of Irish climate policy resulting in a landmark report comprising 41 detailed recommendations from the Committee to the Government. These recommendations provide an important baseline of ambition that if built upon could reduce Ireland's growing emissions and put us on a pathway to honouring our climate obligations.³
- In May 2019, the Dáil voted to declare a "climate and biodiversity emergency", and, crucially, to "accept and endorse" the recommendations of the Committee.

Concurrent with these developments is the increasing volume of scientific warnings that are unequivocal in their evidence that climate change is happening now and that the timeframe for significant emissions reductions to avert the most dangerous impacts is quickly diminishing:

- 80% of already-known fossil fuel reserves must stay in the ground if the international community is to reach its goal of staying 'well below' 2°C global average temperature rise – as stated in the Paris Agreement (UNFCCC, 2015).⁴
- 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 pre-industrial levels should be the goal underpinning all national targets and policies, concluding that net zero emissions is the appropriate emissions target for 2050. A rapid, fair and transformative transition to a decarbonised global economy is now required over the next decade to prevent the spiralling of catastrophic direct and indirect climate impacts.⁵

³ Joint Oireachtas Committee on Climate Action (2019). *Report of the Joint Committee on Climate Action Climate Change: A Cross-Party Consensus for Action*. Available at: https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_climate_action/reports/2019/2019-03-28_report-climate-change-a-cross-party-consensus-for-action_en.pdf

⁴ This scientific paper by McGlade and Ekins (2015) concludes that "the unabated use of all current fossil fuel reserves is incompatible with a warming limit of 2 °C" and that "globally, a third of oil reserves, half of gas reserves and over 80% of current coal reserves should remain unused from 2010 to 2050 in order to meet the target of 2 °C". For access to this paper, see: <https://www.nature.com/articles/nature14016>

⁵ Intergovernmental Panel on Climate Change (IPCC), 2018: Summary for Policymakers. In: *Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas*

- Keeping the global average temperature increase below 1.5°C requires a decline in global net anthropogenic CO₂ emissions by approximately 45% (from 2010 levels) by 2030 and reaching net zero emissions by 2050 (in addition to deep reductions in other greenhouse gases).⁶
- Climate impacts have the potential to undo the last 50 years of progress in development, global health, food security, and poverty reduction, and to push an additional 120 million more people into poverty by 2030. In June 2019, the UN Special Rapporteur on extreme poverty and human rights explicitly called out governments for failing to seriously address climate change in any meaningful way, concluding that a radically more robust, detailed and coordinated approach is crucial.⁷

Government failure to implement an economy-wide climate policy framework to date to tackle rising emissions has earned Ireland a reputation of being a climate laggard. The absence of a detailed decarbonisation roadmap means that Ireland will fail considerably on its 2020 climate and energy targets, and it must implement and increase the pace of climate action with new and additional policy measures if it intends to substantially reduce emissions across all sectors, in line with current 2030 and long-term obligations.⁸ The Government has acknowledged that current policies and measures on climate change are not working,⁹ and it is within this context that the Climate Action Plan promised to “make Ireland a leader in responding to climate change”, “to lead the way in the revolution that is needed”.

- Given the unprecedented call from across Ireland for strong political leadership on climate change, we regard this Plan as 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.

This report *The new Climate Action Plan; Will it lead to a revolution in how we live?* draws on a detailed assessment by the Stop Climate Chaos Coalition and the Environmental Pillar of the

emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty [Masson-Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, Maycock, M. Tignor, and T. Waterfield (eds.)]. *World Meteorological Organization, Geneva, Switzerland, 32 pp.* Available at: <https://www.ipcc.ch/sr15/chapter/summary-for-policy-makers/>

⁶ IPCC (2018).

⁷ See press release: United Nations Human Rights Office of the Commissioner, UN expert condemns failure to address the impacts of climate change on poverty (Available at: <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=24735&LangID=E>)

⁸ Environmental Protection Agency. (2018) Ireland’s Greenhouse Gas Emissions Projections 2018-2040. Available at: <https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2018-2040/>

⁹ 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." (See: <https://greennews.ie/taoiseach-tells-eu-not-proud-ireland-climate-laggard-role/>)

recently published climate action plan. As part of this assessment, we draw on our five-tests developed in advance of the Plan’s publication to assess and evaluate its credibility.¹⁰

- When published in mid-June 2019, the Climate Action Plan was described by the Minister and the Taoiseach as “*ambitious but realistic*”, “*sensible and fair*”, “*most economic*”, that it will “*nudge people to change behaviour*”, “*create the least burden on our people*”, and “*deliver the revolution in how we live*”. We believe that although the Plan comprises positive overarching governance recommendations, it does not go far enough to bring about the necessary early and deep emissions cuts required over the next decade, nor does it respect the cross-party support and political impetus provided by the JOCCA to begin to align Ireland’s climate policy with the Paris Agreement.

A welcome commitment to implement the Committee’s recommendations on governance

Failure to include strong enough governance elements in the Climate Action and Low Carbon Development Act 2015 has meant that despite existing legislation, Ireland is way off course to meeting its 2020 and 2030 obligations. Without major changes to the planning and accountability framework for climate action, it is not credible to expect that new climate measures will succeed when previous plans have failed to deliver.

It is within this context that we welcome the acknowledgement in the Climate Action Plan that “correct governance structure” is necessary for effective climate action. The Plan contains some positive proposals in relation to new mechanisms to be put in place to ensure delivery and oversight of climate measures. These include:

- the introduction of legally-binding five-year carbon budgets on greenhouse gas emissions under a new Climate Action (Amendment) Bill 2019,
- the establishment of a Climate Action Delivery Board chaired by the Department of the Taoiseach, which will hold individual Departments and public bodies accountable for the delivery of climate action measures and which will deliver quarterly progress reports,
- the establishment of an external and strengthened Climate Action Council to advise and monitor Government progress in reducing emissions,
- the establishment of a standing Committee of the Oireachtas to act like a Public Accounts Committee for carbon and to ensure accountability across Departments, and
- that all major Government investment decisions will be subject to a carbon impact and mitigation evaluation under the Plan.

While the decision to enshrine into law the current 2050 target is a positive move (this should have been included in the Climate Action and Low Carbon Development Act 2015), this target is

¹⁰ Stop Climate Chaos coalition (June 2019) *Five Tests for the All-of-Government Climate Action Plan*. Available at: https://www.stopclimatechaos.ie/download/pdf/five_tests_for_the_all_of_government_climate_action_planbriefing_from_stop_climate_chaos.pdf

not compatible with the Paris Agreement. 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 pre-industrial levels should be the goal underpinning all national targets and policies, concluding that net zero emissions is the appropriate emissions target for 2050. The report emphasises the importance of revising upwards the EU’s collective targets for 2030 (currently 40% below 1990 levels) and 2050 (currently 80-95% below 1990 levels). This requirement for raising ambition has been unequivocally clear since 2015 when it was explicitly integrated into the framework of the Paris Agreement. The Government must now go further by ratcheting up ambition on the 2050 target and specifying in detail, the manner that it proposes to follow to put Ireland on an emissions pathway aligned with the Paris Agreement.

- **An important litmus test for how genuinely committed the Government is to this Plan and to tackling climate change, will be the urgency with which these governance proposals are implemented and enshrined in law.**

The JOCCA agreed that new climate legislation should be enacted by the Oireachtas in 2019, and would contain a legally binding target for net zero emissions by 2050, as well as interim 2030 targets. The Climate Action Plan rows back on these cross-party recommendations, instead committing to publishing legislation in March, 2020. This is very different to *enacting legislation*, and may result in a wait until the end of 2020 or beyond until a new climate law is passed.

- We note, for example, in the Annex of Action accompanying the Plan, that Quarter 1 2020 is listed as the timeline for publication of the new Climate Action (Amendment) Bill. As a matter of urgency to ensure the governance framework is established, we urge the Government to publish the Heads of the Bill so that the required pre-legislative scrutiny by the relevant Oireachtas can begin as soon as the Dáil returns from its summer recess. That would allow the Second Stage of the full Bill to take place in the Dáil before the end of the year or first thing in 2020 at the latest.
- We also urge the Government to provide for the preparation of the first carbon budget with the urgency specified in JOCCA report and that it be **presented to the Dáil within 12 months as proposed by the Committee**, i.e. before the underlying legislation is passed (Chapter 1, Section 1.3).¹¹

It is important to acknowledge the scale of political achievement that underpins this Plan, nevertheless, the ability to bring about the legislative changes with the urgency that they require will necessitate strong and consistent political leadership, as well as the necessary capacity and resources within Departments. We recognise that the JOCCA proposes an ambitious timeframe

¹¹ “that the Climate Action Council be reconstituted from the existing Climate Change Advisory Council in 2019 and be in a position to bring forward the first five-year carbon budget in 2020. In that regard, the augmented Climate Action Council will devise and propose carbon budgets, starting with the first one for 2021-2025 by Q1 2020 and the carbon budgets for 2026-2030 and 2031-2035 as soon as possible thereafter.” (Joint Oireachtas Committee on Climate Action.)

for new legislation, however the absolute scale and utter urgency of the climate and ecological crises facing current and future generations overrides the practical challenges and political inertia that may be related to introducing new legislation in a short timeframe.

- To help drive a sustained agenda of policy development to give Ireland a realistic chance of achieving its 2030 obligations and put us on a medium-term path of achieving net-zero emissions by mid-century, it is crucial that the Plan’s new mechanisms and governance arrangements are adopted and put in place without delay as specified in the JOCCA report. This would allow for a solid climate policy governance framework regardless of external political and economic shocks.

The Plan’s failure to acknowledge the scale and urgency of the climate challenge

Overall, whilst we welcome the Plan’s positive overarching governance recommendations, we are of the view that aside from these elements, a key failure is the lack of any real commitment to immediate, significant and sustained reductions over the next decade.

The Plan rightly acknowledges that “*the earlier we act, the less dramatic and costly it will ultimately be for Ireland. Acting now reduces our long-term transition costs, and brings additional benefits such as better air quality and reduced fuel poverty.*” (pg. 12) Yet, the Government proposes only a 2% decline in emissions per annum from 2021 to 2030 to meet our EU targets, and to a steeper decline of 7% per annum to achieve a minimum 80% emissions reduction by 2050, relative to 1990 levels. This is despite evidence – which is also emphasised in the JOCCA report (pg. 7) – that Ireland has a very limited remaining Paris-aligned carbon budget, and will need to reduce emissions by between 5-10% per annum to order to achieve net zero emissions by mid-century.¹²

- A cautious approach to emissions reductions planning as evident in the Plan, goes against the reality that limiting global temperature increase to 1.5°C (with a more than 50% chance of success) will require the Government to implement measures that lead to rapid, deep and permanent decarbonisation, negative carbon emissions in the medium term, and enhanced biosphere resilience.¹³ Because of the cumulative nature of carbon dioxide

¹² See: MaREI, 2018. Note to Joint Oireachtas Committee on Climate Action [online]. Available at: https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_climate_action/submissions/2018/2018-12-12_submission-marei-centre_en.pdf [accessed on 03.07.2019].

Glynn, J. Gargiulo, M., Chiodi, A., Deane, P., Rogan, F. & Ó Gallachóir, B. (2018): Zero carbon energy system pathways for Ireland consistent with the Paris Agreement, *Climate Policy*, <https://doi.org/10.1080/14693062.2018.1464893>. Also see: McMullin et al. (2019 and forthcoming, Dublin City University).

In addition to these references, a report from An Taisce cites that reductions of an absolute minimum of 6-7% and 5-6% per annum respectively, between now and 2023 in electricity, built environment and transport, and in agriculture and land-use, including forestry are required to bring Ireland in line with its already agreed national policy position for 2050. See: An Taisce (2019) *Getting Ireland’s climate action “back on track”: What exactly does it mean?* Available at: <http://www.antaisce.org/sites/antaisce.org/files/jocca-getting-back-on-track-atcc-note.pdf>

¹³ Rockström et al. (2016) *Earth’s Future, The World’s Biggest Gamble*, <https://doi.org/10.1002/2016EF000392>

pollution, Ireland’s continuing delay in increasing action and ambition will drastically escalate the effort that will be required in the future, and will have an overall negative impact on the economy.¹⁴ Pursuing a pathway of “least burden” now displaces the greatest burden onto future generations. This is morally questionable policy at the very least.

- In most sectors, delaying action will increase the potential of an abrupt transition, which will be costlier on society as a whole. As acknowledged in 2018 by the then Governor of the Central Bank of Ireland, “if the pace of transition is too slow, a sharper adjustment will be ultimately required, posing macroeconomic and financial stability risks.”¹⁵
- Commitment to the least action required to meet Ireland’s 2030 target fails to consider the sharper social or economic adjustment that will be necessary to bring about more significant reductions at a later date, the costs associated with failing to capitalise on the immediate opportunities of an ambitious decarbonisation pathway, or more broadly, the rising cost of unfolding climate impacts. Nor does the Plan recognise that current 2030 targets are incompatible with a Paris-aligned emissions reductions pathway, and any equitable sharing of the quickly diminishing global carbon budget requires developed nations, such as Ireland, to decarbonise before 2050.
- Even if Ireland intends to reach net zero emissions after 2050 (although this objective is not aligned with a Paris compatible emissions pathway), investment decisions in the next 5-10 years are critical to prevent carbon lock-in.¹⁶

We are concerned that this cautious approach to emissions reductions is limited by an overreliance on the Marginal Abatement Cost Curve (MACC) as a mitigation planning tool. This tool depicts the cost and abatement potential of available mitigation options, and is used to show what policies should be prioritised based on their cost-effectiveness alone.

- We believe that by focusing on the cheapest abatement options to reach short term targets (i.e., 2030), the Government runs the risk of furthering carbon-intensive lock-in, making medium to long-term targets (2050) more difficult and expensive to reach.¹⁷
- In their 2017 Annual Review, the Climate Change Advisory Council explicitly cautioned that the MACC curve “does not reflect the cost effectiveness of measures in achieving the long-term goal for which inter-temporal dynamics may be important”, and that policy

¹⁴ An academic paper published in May 2019 found that a delay in climate action to 2030 has an “overall negative impact on the economy”. See Winning et al. (2019) Nationally Determined Contributions under the Paris Agreement and the costs of delayed action, *Climate Policy*, <https://doi.org/10.1080/14693062.2019.1615858>

¹⁵ Lane, Philip. *Climate Change and the Irish Financial System. Economic Letter. Vol. 2019, No. 1.* Dublin: Central Bank of Ireland, 2019. Available at: [https://www.centralbank.ie/docs/default-source/publications/economic-letters/vol-2019-no-1-climate-change-and-the-irish-financial-system-\(lane\).pdf?sfvrsn=2](https://www.centralbank.ie/docs/default-source/publications/economic-letters/vol-2019-no-1-climate-change-and-the-irish-financial-system-(lane).pdf?sfvrsn=2)

¹⁶ Glynn et al. (2018).

¹⁷ Vogt-Schilb, A. and Hallegatte, S. (2014) Marginal abatement cost curves and the optimal timing of mitigation measures. *Energy Policy*, <https://doi.org/10.1016/j.enpol.2013.11.045>

prioritisation must also be “informed by understanding of transaction costs, co-benefits and trade-offs of the policies and measures.”¹⁸

- Evidence suggests that planning for targets in the near-term may best be achieved by focusing on longer-term objectives (i.e., 2050 targets). This involves investing now in mitigation options that although they might be expensive and take time to implement, have higher abatement potential, as opposed to over-investing in mitigation measures that are cheap yet offer limited abatement potential in the long-term.¹⁹
- Reliance on the MACC analysis for mitigation planning does not allow for analysis of the distributional costs of mitigation measures, the implementation barriers on these options or the implications of behavioural failures or lack of resources, the external environmental costs, or co-benefits. The absence of data beyond 2030 does not allow for any consideration of the effectiveness of the MACC curve in designing a mitigation plan that can lead to optimal policy choices in view of longer-term climate objectives.

Climate action in the Plan is framed within the context of its potential burden on Irish society. Related to this narrative, mitigation must be cost-effective, the emphasis must be on minimising disruption to current national development plans, and future ambition is dependent on technological evolution.

- We regard these framing limitations as a consequence of an over-reliance on an abatement tool focused on least cost options. Although we accept that climate action will require significant changes that require public and private sector support, we argue that climate policy and plans must be built on a transformative vision for a low carbon Ireland that is inclusive, fair and socially progressive.
- This “least burden” framing adopted throughout the Plan seems to suggest a preference for avoiding or delaying political decisions that may be potentially challenging. An alternative approach based on the science and reality of climate change involves establishing an ambitious long-term emission-reduction strategy that has as its starting point a long-term target that is compatible with the objectives of the Paris Agreement. The Government then needs to identify what needs to happen to achieve this objective across all economic sectors.
- The Government must present a compelling vision for a decarbonised Ireland that, while it accepts and embraces the climate challenge, also ensures that fairness, equity, and a safe and sustainable future are at the centre of this vision.

¹⁸ Climate Change Advisory Council (2017) *Annual Review 2017*. Available at: www.climatecouncil.ie

¹⁹ Ward, D. (2014) The failure of marginal abatement cost curves in optimising a transition to a low carbon energy supply. *Energy Policy*, <https://doi.org/10.1016/j.enpol.2014.03.008>

A missed opportunity to build on the recommendations of the Joint Oireachtas Committee on Climate Action

The Plan states that it builds on the policy framework and measures set out in the National Mitigation Plan, Project Ireland 2040 and the draft National Energy and Climate Plan. Yet, there is an absence of any critical acknowledgement of the failure of these existing plans and proposals in furthering Ireland's decarbonisation agenda.

- The Mitigation Plan has been called out by both coalition groups for being wholly insufficient in putting in place a credible and coherent policy framework to contribute to any significant level of reductions in Ireland's greenhouse gas emissions.²⁰
- In late June 2019, the European Commission outlined that Ireland's draft NECP did not provide sufficient detail on how Ireland intends to reach its 2030 climate and energy targets, and its recommendation concluded that Ireland must now provide details of a more concrete pathway for emissions reductions between 2020 and 2030.²¹
- Furthermore, recent projections from the Environmental Protection Agency show that Project Ireland's 2040 National Development Plan is at odds with the scale of emissions reductions Ireland must achieve over the next ten years, and the longer term reductions required over the coming decades to bring Ireland's climate policy in line with the objectives of the Paris Agreement.²²

Given the failings of these existing plans, we emphasised that it was crucial that the Climate Action Plan set out new, detailed measures for each and every sector of the economy. We repeatedly argued that if the recommendations of JOCCA were effectively, expeditiously and comprehensively implemented, this would allow a shift in Irish climate policy that would help align Ireland's climate action framework with the Paris Agreement goals.

- The Plan acknowledges the recommendations of the JOCCA as being *a very solid foundation*. Nevertheless, the Plan ignores, does not adopt, or weakens some of the recommendations and timelines proposed for policy delivery by the JOCCA. By not building on all of the JOCCA recommendations with specific, concrete policy measures, it has weakened and undermined the authority of the JOCCA report and the political importance of the JOCCA process. Notably, twelve of the JOCCA's crucial recommendations have already passed their recommended timeline for implementation.
- This failure represents a significant missed opportunity for Government to i) fulfil the public mandate of the Citizens' Assembly and respond to the unprecedented public concern about climate change, ii) respect the cross-party support and political impetus

²⁰ See our submission to the draft National Mitigation Plan available at: https://www.stopclimatechaos.ie/download/pdf/scc_pillar_joint_submission_on_national_mitigation_plan.pdf

²¹ The recommendation from the European Commission on Ireland's NECP is available at: <https://ec.europa.eu/energy/en/topics/energy-strategy-and-energy-union/governance-energy-union/national-energy-climate-plans>

²² Environmental Protection Agency. (2018) Ireland's Greenhouse Gas Emissions Projections 2018-2040. Available at: <https://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2018-2040/>

that now exists to enable Ireland move beyond a business-as-usual approach to tackling climate change, and iii) drive forward sustained emissions reductions.

We look at the following sectors from the Plan as examples to illustrate the Government's failure to take on board the full recommendations of the Committee, or to provide sufficient level of policy or timeline detail around adopted recommendations:

Transport: strong growth in greenhouse gas emissions from transport is projected over the coming decade.²³ The Plan ignores the recommendations from the JOCCA for a radical modal shift towards quality sustainable transport options by failing to include detailed, specific measures aimed at reducing the level of private car dependency as the primary means of travel. Instead, it is our view that the Plan over-relies on technological progression and biofuels to decarbonise transport, while shifting responsibility for decarbonisation in this sector onto individuals through over-ambitious and unrealistic electric vehicle targets.²⁴ Whilst this proposal is regarded by Government as the most cost-efficient measure, it fails to take into account problems related to congestion and unsustainable commuting times - a limitation which is explained by the over-reliance on the MACC curve as a mitigation planning tool. The Plan also lacks any real vision for rural-based sustainable transport options. Immediate measures to sharply increase the quality and frequency of public transport nationally, rapidly building quality cycling infrastructure, and reduce car dependency are the urgent changes needed to end fossil fuel use. Continuing with the Dublin Airport expansion and the construction of motorway infrastructure is counterproductive in light of the serious efforts required to cut transport emissions. We acknowledge that decarbonisation in transport may be difficult and expensive to achieve, but to avoid the shocks related to an abrupt transformation at a later date, it is preferable to decarbonise early in this sector to minimise long-term costs.

Agriculture, forestry and land-use: Despite the Dáil declaring a climate and biodiversity emergency in May 2019, the Plan ignores the JOCCA recommendations for:

- stronger policy coherence between climate and biodiversity policy objectives,
- immediate engagement between all stakeholders on developing a plan to align Ireland's agricultural sector with commitments under the Paris Agreement, and
- the establishment of a taskforce on diversification within the sector.

Instead, what is put forward is a business-as-usual approach that will do little to ensure reductions in a sector where emissions are projected to rise over the next decade.²⁵ The Plan fails to acknowledge that actual mitigation will only be achieved if proposed

²³ Environmental Protection Agency. (2018).

²⁴ Michael McAleer, 'Climate plan: 1m electric cars by 2030 does not look realistic' *Irish Times*, June 18th, 2019.

²⁵ Environmental Protection Agency. (2018).

measures include, at least, a reverse of recent increases in the national herd and a reduction in the use of nitrogen fertiliser. The Plan also fails to address the emissions impact of increasing use of nitrogen fertiliser to increase grass yield.²⁶ In the absence of new additional climate mitigation measures for the land-use sector, mitigation potential is instead left to the new Common Agricultural Policy and the initiative of individual landowners. This effectively ensures continued increase in emissions from this sector.

The restoration of ecosystem resilience must be prioritised to preserve the critical role of ecosystems in carbon sequestration, yet the lack of specific references to utilising and enhancing the full potential of nature based solutions for climate mitigation suggest an inability to join the dots between the biodiversity and climate emergency.

- Afforestation is cited as the main source of credits under LULUCF, yet actual policy detail is vague and mostly aspirational and does not include the JOCCA's recommendation to commission a review and sustainability audit of Coillte's forest business and other activities in conjunction with a review of the Forestry Act, 1988.²⁷
- Despite being an island nation, ocean conservation is all but absent from the Plan – a bizarre omission considering the vital role oceans play in carbon sequestration. Protecting our seas is among the most important areas of climate action but this is not acknowledged.
- The recommendation on realising the emissions reduction potential of drained organic grassland soils is promising but lacks any detail of how this would be achieved. It would also be helpful if information on how the figure of 40,000ha included in the Plan was arrived at. Current implementation of agri-environment schemes in Ireland has several flaws that need to be addressed (e.g. lack of ecological expertise, short-term contracts, and poor monitoring), and which otherwise will threaten a successful outcome.
- No reference is made in the Plan to the role of permanent native woodland or of the need to retain Ireland's remaining peatlands – despite their carbon sequestration potential and ecological value. Nor does the Plan elaborate on any specific, tangible policy actions building on the JOCCA recommendations, such as the need to develop a new national land-use and new national forestry plan as a matter of urgency, and the immediate delivery of a funded programme for peatland restoration.

The last of these recommendations – peatland restoration – was emphasised as a priority recommendation by the Citizens' Assembly and the JOCCA, with a recommended target

²⁶ Imports of nitrogen fertiliser reached 408,000 tonnes in 2018, 38% higher than the 296,000 tonnes in 2011 and much higher than Teagasc estimates. 8.8% increase in synthetic fertilizer nitrogen use in 2017. Synthetic fertiliser is the core driver of agricultural nitrous oxide and methane greenhouse gas emissions. Increased fertiliser use increases grass yield, giving fodder for cattle that results in increased milk, meat and manure/slurry, and also increased climate, air and water pollution.

²⁷ As highlighted recently by the EPA, the carbon sequestration potential of any forest is limited due to harvesting. See: Environmental Protection Agency. (2018).

of net sequestration by 2050, scientifically informed interim targets and a national programme of rewetting to be included in Budget 2020. Only 1% of Ireland's peatlands have been rehabilitated, and yet despite offering multiple benefits in terms of climate mitigation and adaptation, and biodiversity protection, the Climate Action Plan does not build on these recommendations and fails to put forward specific measures and targets. In relation to restoration of peatlands that are Special Areas of Conservation (SAC) and Natural Heritage Areas (NHA), we are concerned that the targets will not be met. The closing date for the last cycle will be 2034/35. In the first cycle which commenced in 2017, only twelve sites in the LIFE raised bog project and possibly two others have had restoration works undertaken. There are a further 44 more SAC raised bog sites requiring restoration. In addition, an additional 61 NHA raised bogs is required but the timeline has not been specified, raising concerns that this target will not be achieved.

On Just Transition: JOCCA recommendations included the immediate establishment of a Just Transition Task Force that encompassed affected workers and their unions, communities, employers, farmers, government and civil society more broadly. Also proposed were specific, immediate actions oriented towards securing support and opportunity, in addition to peatland restoration, for the Midlands region. It is extremely disappointing that the Climate Action Plan ignores or weakens these recommendations and lacks the tangible commitment, based on any real urgency, to put in place an immediate strategy and mechanisms to minimise the social and economic impacts on communities most affected by the transition to a low carbon economy. Instead, the proposed approach, much weaker than the JOCCA recommendation, relies on vague commitments and an existing review group to identify transition needs, rather than an actual task force around a negotiation process. The whole point of an effective just transition is missed; the result here is a reduced potential for a smoother shift away from fossil fuel industries in affected regions, delayed transition away from peat and coal, and delayed emissions reductions.

Buildings: The lack of ambition on home energy is considerably disappointing. The Government plan sets a target of upgrading 500,000 homes to a B energy rating by 2030, this compares to a JOCCA recommendation of 75,000 homes per year over the next 11 years, amounting to more than 800,000 homes by 2030. The Climate Plan reneges on the cross party agreement in the JOCCA and instead commits to a nominal increase in the existing national target (as per the National Development Plan). In addition, concerns regarding resource and skill capacity to deliver on these targets, as acknowledged in the JOCCA, are not addressed in any great detail.

The absence of explicit steps linking domestic policy to European climate governance

Although JOCCA's recommendations provide a baseline of ambition for strengthening Irish climate policy, full implementation of these recommendations will not align our current emissions trajectory and the emissions pathway required under the Paris Agreement. Given the absence of full commitment to these recommendations in the Plan, this gap is amplified. As recognised by JOCCA, 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, and in order to align Irish climate policy with the latest scientific evidence of the IPCC Special Report on Global Warming (2018), Ireland's medium term target will have to be net zero before 2050, with a shorter-term target of at least halving emissions no later than 2030.

- Made explicit in the Plan (pg. 6) is Government support for the ambition emerging within the European Union to achieve a net zero target by 2050, yet it does not address the recommendation of the JOCCA to enshrine into law here in Ireland, a revised 2050 target of net zero emissions.
- Although commitment to enshrine the current 2050 objective into law is a positive move, we note with particular concern that the Committee's recommendation is weakened to a commitment to evaluate the changes required to achieve this target in Ireland, without any concrete detail provided on how this evaluation will be completed. This evaluation and any legislative consequences will be a matter of urgency because of its implications for emissions reductions planning between now and 2030 and beyond, and we urge the Government to conduct this evaluation before the end of 2019 as part of its broader commitment to the European Union Long-Term Strategy (LTS).²⁸

Under the governance of the energy union and climate action rules, Ireland is required to submit to the European Commission, a final National Energy and Climate Plan (NECP) by the end of 2019, and is obliged to contribute an LTS in January 2020.

- The Plan specifically references building on the policy framework of the draft NECP (described by Minister Bruton as a business-as-usual document²⁹). The NECP covering the first period from 2021 to 2030 will have to set out concrete policies and measures in order to ensure that the EU 2030 targets for emission reductions, renewable energy, energy efficiency and electricity interconnection are met. It is important that countries seize the opportunity of the NECP process to address existing gaps in national legislation, and pave the way for higher ambition in line with the Paris Agreements long term objectives.

²⁸ According to calculations by the Climate Equity Calculator, a tool developed by the Stockholm Environment Institute to estimate the fair share effort for individual countries, Ireland must reduce all greenhouse gas emissions to zero within a decade to do its fair share of keeping global warming within the bare 2°C limit. See: <https://calculator.climateequityreference.org/>

²⁹ Kevin O'Sullivan. 'Oireachtas support for increased carbon taxes 'ill-judged''. *Irish Times*, April 15th, 2019.

- The aim of the LTS is to provide a pathway that the EU should consider as its long-term contribution to achieving the objectives of the Paris Agreement. Ireland must submit its final version LTS in January 2020 – with a perspective of at least 30 years. Both the NECP and the LTS must be consistent and coherent with each other, and in line with a net zero vision.

Ireland’s draft NECP has been criticised for lack of ambition and detail on policies, on the poor quality and lack of inclusiveness in the drafting process, and for failing to align Ireland with its current 2030 target, or with a net zero vision for 2050. Criticism was also directed at the poor reference to its integration and coordination with existing policy frameworks. Considerable progress must be made between now and the end of year, if Ireland is to improve its NECP to reflect the urgency of the challenge.³⁰

- We are concerned therefore, by the lack of specific, detailed reference in the Plan to the NECP process, particularly in terms of how the Plan will be fully reflected, including its weaknesses addressed, in a redrafted, strengthened NECP and in the LTS towards 2050 (which Ireland will be required to finalise in early 2020).

What will really help deliver the revolution in how we live?

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, coherent and equitable policies that lead us towards full decarbonisation. Whilst a number of governance elements are positive and welcomed by both Coalitions, we regard the Plan as a missed opportunity to lead on bringing about the “*revolution in how we live*”. If the Government is genuinely serious about tackling climate change and is committed to the merits of this Plan, we urge that, at the very least, it does the following:

- ensure that the preparation of the first carbon budget by the Climate Council proceeds with the urgency specified in the JOCCA report and is presented within 12 months as proposed;
- commits to bringing draft legislation (Heads of Bill) before the Dáil immediately after the 2019 summer recess to enshrine the enhanced policy governance and accountability framework recommended by the JOCCA and included in the Plan;
- commits to building upon the full package of JOCCA recommendations through the retained flexibility in the proposed governance arrangements;

³⁰ CAN Europe (2019) Time to pick up the pace. Insights into the draft National Energy and Climate Plans. Available at: <http://www.caneurope.org/docman/climate-energy-targets/3477-time-to-pick-up-the-pace-insights-into-the-draft-national-energy-and-climate-plans/file>

Luke O Callaghan-White (2019) *Recalibrating Ireland’s NECP*. Dublin: The Institute of International and European Affairs. Available at: <https://www.iiea.com/iiea-blog/recalibrating-irelands-necp/>

- specifies how it intends to fully reflect the commitments in the Plan, and address its weaknesses, in the final National Energy and Climate Plan and in the Long Term Strategy.

Sustained emissions reductions over time requires that policy coherence must form a central part of this overall climate policy framework. There is a considerable level of incoherence between seeking “*to nudge*” (in the Taoiseach’s formulation) individuals, communities and businesses towards climate action, for example, through an increase in a consumer carbon tax, whilst simultaneously pursuing sectoral policies and subsidising polluting activities which jeopardise the likelihood of averting catastrophic climate change.

We have consistently called on the Government to regulate as a matter of urgency, supply-side policies to ensure reductions in fossil fuel use. The positive elements of this Plan and any Government rhetoric on wanting to make Ireland a leader in tackling climate change and leading a revolution in how we live lacks any serious and genuine credibility when the Government continues to issue licenses for the exploration and extraction of fossil fuels off the coast of Ireland. Of most concern is the Government’s recent refusal (July 2019) to allow TDs to even debate the Climate Emergency Measures Bill³¹, which would end the issuing of new licenses for exploration. The use of the “money message” protocol to kill the Bill was an ill-founded and undemocratic abuse of parliamentary procedure. The Government’s blinkered view on extraction not only ignores the non-negotiable nature of climate change and the scale and urgency of the challenge, but also the plight of the millions of people in some of the most vulnerable regions of the world already affected by climate change. Instead, it would be in the Government’s best interest and all our best interests to act on the urgent imperative to end our dependence on fossil fuels – an imperative which is not going away. Without coherence and equity across all economic sectors and policy decisions, emissions reduction efforts are futile and inequity will be enshrined in an overall framework that must be built upon the principles of fairness and justice.

**Stop Climate Chaos Coalition
Environmental Pillar**

July 2019

³¹ The context behind this Bill is available in this briefing from the Stop Climate Chaos Coalition on “Five reasons the Climate Emergency Measures Bill must move to Third Stage without delay”. Available at: https://www.stopclimatechaos.ie/download/pdf/5_reasons_why_the_climate_emergency_bill_must_move_to_3rd_stage.pdf