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

Stop Climate Chaos Coalition and the Environmental Pillar[i]

April 2017

Environmental Pillar
working for a sustainable future

1. Overview

The draft National Mitigation Plan (NMP) contains some welcome discrete proposals such as the preparation of options for phasing out fossil fuels, and a national parking review. It also contains a number of positive new elements in relation to effective climate policy planning including the use of a carbon budget framing; commitment to identifying possible transition pathways to 2050; review of guidance on public expenditure review and appraisal and identification of exchequer and non-exchequer options for financing the transition; and enhancing standing technical and economic advisory capacity for climate policy development.

However, the draft Plan does not represent the increase in ambition required 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.[1] Furthermore, our overall view is that the Plan as currently drafted does not fulfil the task ascribed to it under the Climate Action and Low Carbon Development Act (2015) (herein referred to as the Climate Act) and thus should not be the template for national mitigation planning. The Climate Act (2015) stipulates in Section 4(2) that the NMP must:

- '*specify the manner in which it is proposed to achieve the national transition objective*',
- '*specify the policy measures that... would be required... for furthering the achievement of the national transition objective*',
- '*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*...'.[2]

[1] The Paris Agreement, adopted in December 2015, commits the 196 countries that agreed it to "*holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels*".

[2] The Strategic Environmental Assessment Scoping Report (2015) for the draft NMP outlined that in accordance with Ireland's climate law, the Plan could include, among other aspects, high level objectives for each sector to 2050, mitigation plans for 2020, 2030 and beyond, an outline of the cumulative effects of sectoral action and the implications for Ireland's overall climate objectives and targets, and detail on the proposed mechanisms to measure, report and evaluate progress.

This is the first NMP under the Climate Act, and Ireland's first Climate Plan since the adoption and ratification of the Paris Agreement and the aforementioned promising aspects of the draft Plan should be built upon and strengthened further. ***However***, the Plan should be substantially redeveloped in order to set the agenda in terms of ambition, approach and methodology for climate policy planning going forward.

> **Recommendation: The level of ambition, the proposed approach to policy planning, and the overall framing for climate action reflected in the draft Plan require fundamental changes. It is our view that the Plan as a whole should not be considered an appropriate or adequate template for ambitious, fair climate action and national mitigation policy planning, and a new Plan should be brought forward.**

2. Does the NMP put forward a Plan for delivering Ireland's climate action commitments?

The draft Plan acknowledges the challenges Ireland faces, but fails to identify the specific policy measures and approaches required for further achievement of the mitigation element of the national transition objective (i.e., an 80% reduction in combined emissions from energy, transport and buildings and an approach to carbon neutrality in agriculture by 2050 that does not compromise sustainable food production). This does not reflect the legislative requirements established by the Climate Act (2015), as set out above (Section 1). Furthermore, the absence of a specific policy approach within the draft contrasts sharply with recommendations from Ireland's Climate Change Advisory Council (CCAC) regarding what should be contained within the NMP. These recommendations were outlined in a recent communication to the Minister for Communications, Climate Action and Environment,[3] and in their first advisory report published in November 2016.[4] In this report, the CCAC advised that long-term planning and a stable policy framework comprising concrete policies and measures

[3] See: *March 2017 - Letter to Minister Naughten regarding the preparation of the National Mitigation Plan.* Available at: http://www.climatecouncil.ie/councilpublications/otherpublications/

[4] Climate Change Advisory Council (2016) First Report. Available at: http://www.climatecouncil.ie/media/CCAC_FIRSTREPORT.pdf

is required to help achieve immediate 2020 and 2030 climate and energy targets already agreed at EU level. They also stated that the NMP should not only provide a plan outlining how Ireland will achieve these targets, but also include an outline of the roadmap required to reach Ireland's self-declared, 2050 national objective.[5]

Recommendation: While it is acceptable that this Plan cannot determine in detail the thirty-three year policy pathway to 2050, to be credible and effective, however, the Plan should:

1. **Assign an appropriate carbon budget and set out detailed objectives and intended policy measures to be adopted to deliver on these objectives for at least a five year period;**
2. **Account for the implications of the ambition of the Plan for achievement of Ireland's 2020, 2030 and 2050 climate commitments and;**
3. **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. As a rich, developed nation, Ireland can neither morally nor politically justify 'free- riding' on the efforts of others.**

The draft Plan refers to intentions regarding accessing non-exchequer, private financing mechanisms to implement certain climate policies. It can only be assumed that investor confidence would be increased with greater clarity on short, medium and long-term objectives and the policy direction intended to deliver on them.

[5] In 2012, the government were advised to achieve a more unified and consistent set of ambitious policy instruments in developing its climate change strategy, and to achieve a 'more unified and stable view of how policy options and actions will be developed, assessed, monitored, evaluated and adapted' (NESC, 2012: 71). The Strategic Environmental Assessment Scoping Report (2015) for the NMP outlined that the Plan must address compliance with 2020 targets, and contain a policy plan for 2030.

A narrow and incomplete 'cost effectiveness' analysis cannot deliver fair and adequate action

Applying traditional cost-benefit analysis to climate policy can result in delayed action until more information and innovation is available to lower the costs of taking action,[6] and can reduce the potential for new solutions and alternatives to emerge.[7] We believe the current focus within the Plan on 'cost effectiveness' is both inadequate and incomplete and will not serve Irish society or an orderly transition of the economy. In order to be fair and adequate, the following costs must be considered:

The local and global human costs of inaction must be acknowledged

- Under the Climate Act (2015), climate justice is one of the principles that climate policy measures must have regard to. However, reference to climate justice and the global and domestic implications of this principle for domestic climate policy is completely absent in the draft Plan. The draft NMP systematically refers to 'cost-effectiveness' as *the* analytical lens for identifying and proceeding with climate measures, without any consideration of the wider social and distributional equity implications. At domestic and global levels, the poorest and most vulnerable people in society are the worst affected by climate impacts.[8]
- Already, climatic changes are estimated to cause globally between 150-400,000 additional deaths annually[9]. Climate-related extreme events accounted for approximately

[6] Baker, T. (2016) The Economics of Avoiding Dangerous Climate Change. *Studies in Ecological Economics*, Vol. 6, pp. 237-263.

[7] Richardson, H. (2000) The Stupidity of the Cost Benefit Standard. *Journal of Legal Studies*, Vol. 29(1), pp. 971-1003.

[8] IPCC, 2014: Summary for policymakers. In: Climate Change 2014: Impacts, Adaptation, and Vulnerability. Part A: Global and Sectoral Aspects. Contribution of Working Group II to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Field, C.B., V.R. Barros, D.J. Dokken, K.J. Mach, M.D. Mastrandrea, T.E. Bilir, M. Chatterjee, K.L. Ebi, Y.O. Estrada, R.C. Genova, B. Girma, E.S. Kissel, A.N. Levy, S. MacCracken, P.R. Mastrandrea, and L.L.White (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, pp. 1-32.

[9] DARA and the Climate Vulnerable Forum. (2012) Climate Vulnerability Monitor; A Guide to the Cold Calculus of a Hot Planet. Available at: http://daraint.org/wp-content/uploads/2012/09/CVM2ndEd-FrontMatter.pdf

85,000 additional deaths in Europe over the period 1980-2013.[10] In 2015 alone, more than 19.2 million people across 113 countries fled climate-related disasters.[11]

- The local costs of climate change-related extreme events are not adequately incorporated into the draft Plan. Various EPA research projects have examined Ireland's vulnerability and placed estimates of, for example, the cost of coastal flooding with 1m-5m inundation events.[12, 13] The human impacts of increasingly unpredictable and intense weather events on homes and businesses in Ireland are already significant. These impacts are perfectly captured in a Dáil statement on flooding, made in early 2016, by Taoiseach Enda Kenny T.D.:

  > '*Today, my first thoughts and words must be with those who have suffered so much because of the storms of the last month: the men and women whose farms and homes have been flooded, isolated or evacuated, whose livelihoods have been threatened, and who have spent long, anxious days and nights afraid of and mesmerised by the weather forecast of rain, rain, rain, and the heartbreak it brought*'.[14]

- An equity lens factoring in the implications of climate action and inaction for the most vulnerable in Irish society is needed. The social and regional implications (positive and negative) arising from low carbon development across the various sectors, i.e., the costs to workers, businesses and communities that are affected directly by the phasing out of fossil-fuel industries for example, and the potential for economic and other benefits to accrued by communities under decarbonisation measures. It is clear that failure to

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[10] European Environment Agency (2016). *Climate change, impacts and vulnerability in Europe 2016*. pp. 19 and 27. Available at: http://www.eea.europa.eu/publications/climate-change-impacts-and-vulnerability-2016/key-findings

[11] Norwegian Refugee Council (2016) *Disaster and Climate Change*. Available at: https://www.nrc.no/what-we-do/speaking-up-for-rights/climate-change/

[12] Sweeney, J. & Coll, J. (2013) *Current and future vulnerabilities to Climate Change in Ireland.* Climate Change Research Programme (CCRP) 2007-2013, Report Series No. 29. Environmental Protection Agency, Johnstown Castle, Wexford.

[13] Flood, S. and Sweeney, J. (2012) Quantifying impacts of potential sea-level rise scenarios on Irish coastal cities. In: Otto- Zimmermann, K (ed.) *Resilient Cities 2011*. Springer, London, 27-52.

[14] See: http://www.taoiseach.gov.ie/irish/Nuacht/Aithisc_an_Taoisigh_/Dail_Statement_by_the_Taoiseach_Enda_Kenny_T_D_on_Flooding_13_January_2016.html

address or manage, in particular, uneven development and the needs of affected communities will undermine the level of public support for climate action measures.

Delay drives up the costs of decarbonising

- In 2006, the landmark Stern Report on the Economics of Climate Change estimated that the cost of inaction could be as much as 20% of global GDP, in comparison to just 1% of GDP for taking climate action. [15] Stern has since emphasised that current economic models tend to seriously underestimate climate change impacts.[16]
- In 2011, the International Energy Agency (IEA) projected that for every $1 of investment in cleaner technology that needs to be invested in the power sector before 2020, an additional $4.30 would need to be spent after 2020 to compensate for the increased emissions if such investments were not made.[17]
- The cost of adapting to climate change impacts in Ireland has been estimated at between €80m and €800m annually.[18]Adaptation to these impacts is absolutely essential to protect Irish communities and businesses. The most effective adaptation strategy is to pursue and promote globally an increase in mitigation action.
- No attempt has been made in the draft Plan to determine the costs associated with climate impacts on different economic sectors. This contrasts with the acknowledgement in earlier climate action plans – such as the National Climate Change Strategy (2007-2012) – on the economic imperative for early action, and recognition that the costs of inaction greatly outweigh the costs of an early and effective response.

The cost of non-compliance with EU targets must be factored in

- In 2014, the then Department of Environment, Community and Local Government predicted that non-compliance costs with agreed EU 2020 targets could be between €140

[15] Stern (2006) *Stern Review: The Economics of Climate Change,* London: HM Treasury.

[16] Stern, N. (2016) Current climate models are grossly misleading. *Nature*, Vol. 530(7591): 407-409.

[17] *The world is locking itself into an unsustainable energy future which would have far-reaching consequences, IEA warns in its latest World Energy Outlook.* International Energy Agency Press Release 9/11/2011.

[18] Environmental Protection Agency (2013) *Co-ordination, Communication and Adaptation for Climate Change in Ireland: an integrated Approach* (COCOADPT). Available at: https://www.epa.ie/pubs/reports/research/climate/CCRP_30%20COCO%20Adapt.pdf

million and €600 million.[19] This amounts to almost 22% of the projected net fiscal space in 2020[20], which could otherwise fund improvements in health or education. Estimates from the Institute of International and European Affairs (IIEA, 2016)[21] suggest that in the scenario of no new climate action measures being urgently brought forward, combined 2020 and 2030 non-compliance costs to the Irish taxpayers may exceed €6 billion.[22]

- These costs, or attempts to prevent or minimise them, are currently not acknowledged in the draft Plan. They should be factored in, and the likely impact of proposed policy measures in reducing these costs included in the analysis of implications section of each five-year plan.

The cost of failing to capitalise on opportunities of an ambitious decarbonisation pathway must be taken into account

- A London School of Economics study in 2015 concluded that the net economic benefits for countries from tackling climate change continue to outweigh the costs.[23]
- Currently, Ireland is the third highest producer of emissions per person in the EU, and eighth in the OECD. Ireland's emerging reputation as a '*climate laggard*'[24] should be of considerable concern from an economic perspective. In 2016, the Global Green Economy Index, a leading international measure of the green economic performance of eighty countries, showed Ireland slide significantly in global rankings due in particular, to a perceived lack of political leadership on climate change and poor performance on

[19] Department of Environment, Community and Local Government (2014) Future Expenditure Risks associated with Climate Change/Climate Finance. Available at: http://igees.gov.ie/wp-content/uploads/2013/10/Future-Expenditure-Risks-associated-with-Climate-Change-Climate-Finance1.pdf

[20] Department of Finance (2016) Information Note on Fiscal Space 2017 – 2021. Available at http://www.finance.gov.ie/sites/default/files/Information%2Note%20on%20Fiscal%20Space%202017%20fin.pdf

[21] Curtin (2016) 'How much of Ireland's "fiscal space" will climate inaction consume?' Available at: http://www.iiea.com/blogosphere/how-much-of-irelands-fiscal-space-will-climate-inaction-consume

[22] By way of comparison, the cuts in current expenditure during the three years of the Troika bailout (2011, 2012, and 2013) totalled €4.6 billion (See Table 1. here http://bit.ly/NERI2015).

[23] London School of Economics (2015) *Nationally Self-Interested Climate Change Mitigation: A Unified Conceptual Framework.* Grantham Research Institute on Climate Change and the Environment. Working paper.

[24] Irish Times. November 22nd 2016. '*Government criticised for failing to act on climate change; Pat Cox says Ireland is in danger of becoming the climate change laggard of Europe*'. Available at: http://www.irishtimes.com/business/energy-and-resources/government-criticised-for-failing-to-act-on-climate-change-1.2878291

environmental commitments. This is significantly undermining the potential to portray Ireland as a hub for investment potential in the emerging green global economy.

- Research carried out for the Irish Corporate Leaders Group in 2014 highlighted the potential for 90,000 jobs in Ireland under an ambitious decarbonisation agenda.[25]
- Climate policy can be either socially progressive or regressive. On the path to decarbonisation, changes in the labour market will include new job creation, the elimination of certain job roles, substitution and job transformation, yet the draft mitigation Plan provides no indication of how the employment needs in affected communities will be met in the short to medium term. The final NMP should include safeguards to ensure climate policies do not create unintended impacts or amplify the vulnerability of communities.

Consideration of the systemic risks of inaction must become central

- Climate change and directly connected issues of extreme weather and resource crises have consistently featured among the top-ranked risks in the World Economic Forum's Global Risks Report since 2011.
- While climate change is impacting on all world regions, poor countries are and will remain disproportionally affected. However, Europe, including Ireland, is also vulnerable to spill-over effects from climate change impacts occurring outside the EU, especially in relation to trade, infrastructure and transport, geopolitics and security risks, human migration and finance.[26]
- A report by an Advisory Committee to the European Systemic Risk Board, brought before EU Finance Ministers in April 2016, highlighted that '*a late transition to a low-carbon economy would exacerbate the physical costs of climate change*' (2016: 4). It projects that this would result in a 'hard landing', constraining energy supply, increasing whole economy production costs, with effects equivalent to large and persistent negative

[25] Irish Corporate Leaders on Climate Change (2014) *Unlocking Opportunity. The Business Case for Taking Climate Action in Ireland.* Available at: http://www.foe.ie/download/pdf/unlocking_opportunity_the_business_case_for_climate_action_in_ireland.pdf

[26] European Environment Agency (2016) Climate change, impacts and vulnerability in Europe 2016: An indicator-based report. Brussels: European Environment Agency. Available at: http://www.eea.europa.eu/publications/climate-change-impacts-and-vulnerability-2016

macroeconomic shock.[27] This is only one of a swathe of recent initiatives highlighting the systemic risks to the financial system and global economy of failing to act adequately, effectively and in a timely way to decarbonise global and national economies.[28]

Recommendation: To be robust the final NMP must fully explicitly evaluate the direct costs of inaction, the rising costs action 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 of the implications of all of the costs and risks outlined above on an ongoing basis. (Section 2).

3. Does the NMP provide a vision for Ireland in 2050 that the public and private sector can get behind?

The overall tone of the Plan is cautious, bordering on defeatist. The overwhelming message is that climate action is undesirable, costly and that the emphasis must be on minimising disruption to current national development plans. This is in stark contrast to the tone and framing for other policy areas, such as for example, in *Food Wise 2025* (2015) the government's road map for expansion of Ireland's agri-food sector, the National Recovery Plan in 2010, or the Action Plan for Jobs (2012). We accept and endorse the analysis that climate action will require significant changes that require public and private sector support. We believe strongly however, that eliciting such support requires a vastly different vision and tone to that currently set out in the draft Plan. Signs of such an ambitious vision and positive

[27] European Systemic Risk Board (2016) *Too late, too sudden: Transition to a low-carbon economy and systemic risk. Reports of the Advisory Scientific Committee No 6 / February 2016.* Germany: European Systemic Risk Board.

[28] Since 2015, an investigation by the Bank of England into systemic risk led to the establishment of the G20 Financial Stability Board Task Force on Climate-related Disclosure. In recent months the Dutch Central Bank and Swedish Financial Supervisory Authority, the Australian Prudential Regulation Authority, Deputy Governor of the Bank of Canada, and a joint report by the French Treasury, Central Bank and Prudential Regulators have all initiated national level consideration of these issues.

tone were evident on the publication of the Energy White Paper[29] produced by the same Department in December 2015 but they are absent now.

Scotland's Draft Climate Change Plan (2017-2032) provides a useful illustration of a framework that is not only ambitious, policy implementation/outcome and target-focused, but also frames climate action as providing an opportunity for innovation. The Scottish Plan also acknowledges the principles of climate justice and Scotland's international commitments. Denmark and Sweden provide other visionary examples of where governments have accepted and embraced the necessity and inevitability of the change required, and are choosing to make decarbonisation central to their growth and job creation strategies.[30]

Effective climate action could significantly strengthen the stability and resilience of the domestic economy. In many cases, this action does not necessarily require new exchequer resources, but rather the elimination of incoherent policies, re-allocating existing resources, and recalibrating incentives towards low carbon development.[31]

> **Recommendation: In order to provide a vision for Ireland in 2050 that the public and private sector can get behind, the NMP must 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 around climate action if the public and private sector are expected to support the measures needed.**

[29] Department of Communications, Energy and Natural Resources (2015), "Energy White Paper sets ambitious course for carbon-free energy sector". Available at http://www.dccae.gov.ie/en-ie/news-and-media/press-releases/Pages/Energy-White-Paper-sets-ambitious-course-for-a-carbon-free-energy-sector.aspx

[30] Nordic Council of Ministers (2014) Nordic Action on Climate Change. Copenhagen: Nordic Council of Ministers. Available at: http://norden.diva-portal.org/smash/get/diva2:768493/FULLTEXT01.pdf

[31] Irish Corporate Leaders on Climate Change (2014) *Unlocking Opportunity. The Business Case for Taking Climate Action in Ireland.* Available at: http://www.foe.ie/download/pdf/unlocking_opportunity_the_business_case_for_climate_action_in_ireland.pdf

The National Mitigation Plan, like the forthcoming National Dialogue on Climate Change,[32] can only be credible and meaningful if it is based on the science and the required level of action to align Ireland's decarbonisation agenda with its fair share of the global effort to deliver on the Paris Agreement commitments. In the National Dialogue, the public can and should be asked for views on the '*how to*' rather than on '*how much*'.

> **Recommendation: Equipped with the scientific evidence and knowledge of the implications of a failure to act, the Government must frame the Dialogue in terms of a clear and unswerving commitment to act ambitiously and fairly on climate change. This is essential to protect society from the threat of climate change and ensure that Ireland is in a position to reap the social, health and economic opportunities offered by meaningful climate action.**

4. Does the NMP add up to Ireland doing its fair share?

Measuring Ireland's fair share of climate action

A fundamental test for the adequacy of the draft mitigation Plan is whether or not it contains and details comprehensive action to enable Ireland to do its fair share towards mitigation. There are four benchmarks for what Ireland's *fair share* of action is: its 2020 targets as agreed with EU partners, proposed 2030 targets (currently under negotiation), the National Transition Objective for 2050 (established by the Government in line with the EU's 2050 objective), and finally, Ireland's obligations under the Paris Agreement.

These targets must be reviewed on foot of the temperature goals adopted in Paris, and as with all other committed countries, Ireland will be required to ratchet up its ambition and ramp up wide-reaching policy implementation to achieve these goals. The adoption of a carbon budget framework in the draft Plan is a welcome development; however, this framework is not rigorously applied.[33] Furthermore, the draft Plan is required to set the

[32] More information about the National Dialogue on Climate Change can be viewed at: http://www.dccae.gov.ie/en-ie/energy/topics/Energy-Initiatives/Pages/NDCC.aspx

[33] An emissions target can be expressed in two ways:

parameters for other Ministers to frame their sectoral mitigation plans. This is as intended in the Climate Act (2015). However 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 carbon budget.

> **Recommendation: To provide a useful guide for policy development and implementation, we recommend that the final Plan should contain an overall carbon budget for the achievement of the National Transition Objective by 2050 (this calculation is made below). 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.**

Ireland's 2020 targets

The EPA has consistently stated that current plans and policies are insufficient to bring Ireland in line with its 2020 targets, strong incentives are needed to move away from fossil fuel dependency, and Ireland's current emissions trajectory demonstrates the need for new and innovative measures to meet the challenges Ireland faces.[34]

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1. An "end-point" reduction level: a percentage reduction in annual emissions by a certain year, relative to some reference year. In itself such a target says nothing about the planned *pathway* of emissions over this period (they might decline steadily, or might go up first and then subsequently decline more quickly etc.): but this detailed pathway may make a big difference to the actual climate impacts (even if the end-point target is met). Hence, an end-point target in itself is a poor tool for policy planning.
2. The total amount of accumulated emissions allowed over a certain time (or, indeed, for all time into the future). This is known as a carbon budget. The science tells us that, for any given temperature increase limit, there is a corresponding, finite, remaining amount of global atmospheric capacity to absorb emissions, largely regardless of how long or how short a period those total emissions are spread over. Carbon budgets are better planning tools, as they reflect the "zero sum" nature of the trade-offs of remaining emissions across sectors and across time. If we continue to emit more now, we must emit even less in the future (i.e., the detailed shape of the reduction pathway doesn't really matter as long as the cumulative total is the same). If one sector is allowed a greater share of the available budget, some other sector(s) must be allocated less. On a global level, when one country annexes to itself a greater share of the remaining global budget, it is essentially expecting others to settle for less.

Ireland has used both ways of expressing targets in the past. For example, the Kyoto target for the 2008-2012 period was expressed both as a limit on emissions of 13% above 1990 levels, and as total emissions of 314 Mt CO_2.

[34] See: '*Greenhouse gas emissions projected to increase strongly as economic growth takes hold*'. EPA Press release, April 13th, 2017. Available at: http://www.epa.ie/newsandevents/news/name,62088,en.html

Ireland's 2020 climate target is to reduce combined emissions from transport, buildings and agriculture by 20% below 2005 levels.[35] The draft Plan expresses this 2020 target as a carbon budget of 338 $MtCO_2e$ for 2013-2020. As acknowledged earlier in this submission, the draft Plan concedes that 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 $MtCO_2e$, an emissions gap to target of 12 $MtCO_2$.

In the draft Plan, the Government contends that Ireland's 2020 emissions target is '*misinformed*' and '*not consistent*'. There is some academic debate about the precise basis for calculating this target inside the overall EU target framework, but is not credible as the dominant reason for Ireland being so off track on our 2020 targets. Historically, Irish climate policy has suffered from an implementation gap over the last two decades. The stated objective of 2000 and 2007 National Climate Change Strategies was to ensure that climate commitments would be met in a coherent and cost-efficient manner. While certain measures adopted were implemented as planned, many were subject to significant delay or were not implemented at all. According to IIEA analysts, had the measures contained in those documents been implemented in a timely manner, Ireland's climate commitments could have been achieved.[36]

Within this draft Plan, the Government also attributes Ireland's failure to meet its 2020 targets to '*reduced investment capacity over the period of the economic downturn*'. We acknowledge there were investment restrictions created by the economic recession (which for example, constrained retrofitting of buildings). However, the recession also contributed directly to significantly reducing emissions over the affected years. Moreover, there has been a failure by the Government, in recent years, to deliver effective measures to decouple resumed economic growth from increasing emissions.

[35] 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.

[36] Curtin, J., and Hanrahan, G. (2012) Why legislate? Designing a Climate Law for Ireland. Dublin: The Institute of International and European Affairs. Available at: http://www.iiea.com/publications/why-legislate-designing-a-climate-law-for-ireland

This historical implementation gap has been compounded by an absence of policy planning; it is difficult to point to any substantial new measures adopted since the 2020 target period commenced in 2013. Furthermore, the very fact that the draft mitigation Plan on achieving targets for 2013-2020 is being published in 2017 (a midpoint through the required time frame, and five years since the last action plan expired) reflects a deeply concerning lack of intent. This delay will only intensify the short and long-term costs detailed in the opening section of this submission (Section 2).

Ireland's proposed 2030 targets

Ireland's provisional target for 2030 is a 30% cut in the annual aggregate emissions of the transport, buildings and agriculture sectors. The carbon budget for these sectors is approximately 383 $MtCO_2e$ for 2021 to 2030. Based on current trends, the EPA project that Ireland will produce almost 456 $MtCO_2e$ over the same period; this leaves an emissions gap of 73 million tonnes, representing a 19% overshoot on the carbon budget.[37] Despite the considerable financial penalties Ireland may face over the coming decade to 2030 and the significant local and global human costs (as detailed earlier in Section 2), the draft Plan fails to specify how the Government intends to close this emissions gap to target.[38]

It is a significant concern that the draft Plan indicates that the Government's current climate plan is to put off action and investment now and instead knowingly expose Irish society to financial penalties that could be equivalent to the levels of spending cuts during the years of the financial Bailout (see footnote 23). It is also notable that the EU's collective and Member State targets will have to increase under the ratchet mechanism under the Paris Agreement.

[37] Environmental Protection Agency (2013) *Ireland's Greenhouse Gas Emissions Projections2012-2030.* Wexford, Ireland; EPA. Available at: https://www.epa.ie/pubs/reports/air/airemissions/EPA_GHG_Emission_Proj_pub_2013_FINAL.pdf

[38] These emissions gap figures are based on a proposed 2030 target. As negotiations on this target move to the Council of Ministers, there are signs that other governments, most notable Germany, may reject any concessions granted to Ireland. See for example: '*Germany cools hopes on climate targets*'. The Times. April 2nd, 2017. Available at: https://www.thetimes.co.uk/article/germans-cool-hopes-on-climate-targets-6w52zml06

Ireland's 2050 National Transition Objective

The national policy position, adopted by the Government in 2014 (pre-Paris), 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. The policy ring-fences all available national greenhouse gas sinks from land use to be counted as offsets 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".

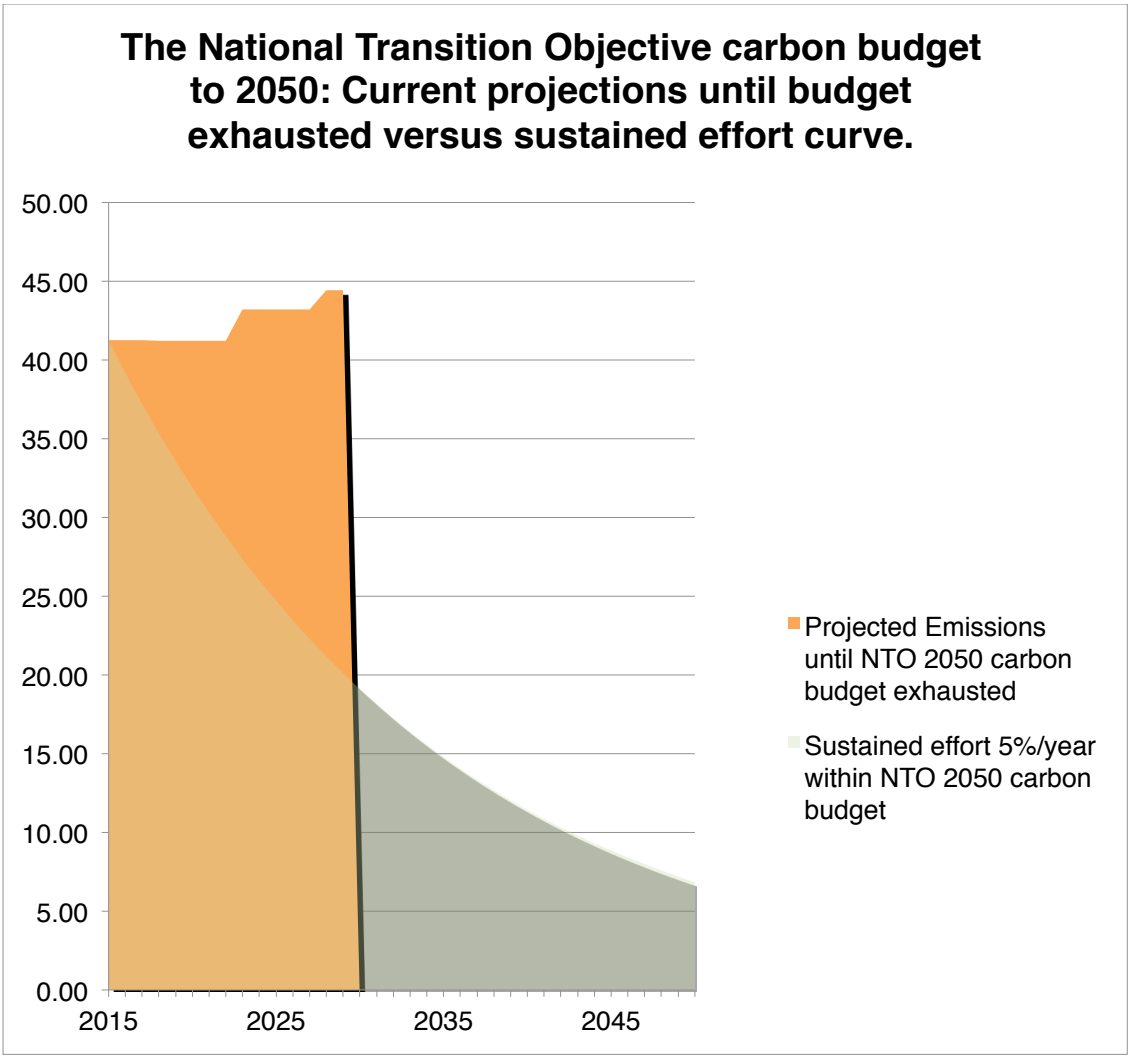
Overall, the objective is at the lower end of ambition of the agreed EU objective of 80-95% reduction in total annual emissions by 2050, and has not been updated to reflect the goals of the Paris Agreement (see below).[39]

For electricity, building and transport sectors:

- In 2015, emissions amounted to 41 million tonnes per annum, 17% above 1990 levels;
- The 2050 target is seven million tonnes (in comparison, 1990 levels were 35 Mt);
- 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,* 653 million tonnes of carbon dioxide.

Yet, 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 CO_2 – 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 (see graph below).

[39] Notably, the European Union 2030 target is currently not consistent with limiting temperature rise to below 2°C, let alone to limiting the increase to 1.5°C.



During 1990-2015, annual emissions from the agriculture sector decreased by 14% (from 21 million tonnes to 18 million tonnes of carbon dioxide equivalent ($MtCO_2e$). Based on a review of analysis by Teagasc, We estimate that by 2050 Ireland's recognised carbon sinks will have a capacity of between current levels of 3.5 million tonnes per year (i.e., current sink potential) and a maximum of nine million tonnes per year (i.e., maximum sink potential).

- Under the maximum sink scenario, even with all this enhanced sink activity allocated to the agricultural sector, agricultural emissions must still be halved from 18 million tonnes to nine million tonnes per year by 2050. This represents year-on-year reductions of 2% a year, every year between now and 2050.

- Under the current sink scenario, an emissions reduction in the agricultural sector from 18 million tonnes to 3.5 million tonnes per year is required by 2050. This would

represent a 5% per annum reduction, every year between now and 2050, the same level of effort as the rest of the economy and society.

The draft mitigation Plan offers no suggestion of agriculture policies commensurate with even the lower end of these absolute emission reduction requirements.

> **Recommendation: The mitigation plan must be revised to 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.**

How does the draft Plan measure up compared to Ireland's Paris commitments?

Combined international action plans are, as yet, inadequate to achieving the goals of the Paris Agreement (i.e., 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*). Independent analysis conducted by Climate Action Tracker indicates that existing Nationally Determined Contributions (NDCs), or national pledges, made under the Paris Agreement are not in line with the temperature goals agreed in Paris. Current pledges still add up to approximately 2.8°C increase in global warming.

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. In addition, Ireland would have to finance additional overseas mitigation measures. The Climate Fair Shares model (which applies a more flexible balance between achieving domestic reductions and funding overseas mitigation) estimates that Ireland's equitable ("fair share") contribution would be to reduce emissions by 53%-63% below 1990 levels by 2025, and fund overseas action by US$4.29 billion per annum. This would limit annual emissions in 2025 to between 20-26 million tonnes of CO_2e, compared to EPA projections of around 63 $MtCO_2e$. This represents an emissions *gap* of around 40 million tonnes per annum already in 2025, the same as Ireland's total emissions from all sectors except agriculture in 2015. Currently, therefore, 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.

All existing EU and Irish targets will have to be radically revised strengthened in the light of the Paris goals, and because of the cumulative nature of carbon dioxide pollution, Ireland's continuing delay in increasing action and ambition drastically increases the effort that will be required in every future year. The draft mitigation Plan must indicate in detail how Ireland is preparing to strengthen ambition and set the agenda in terms of approach for climate policy planning in line with the goals of the Paris Agreement.

> **<u>Recommendation:</u> The mitigation plan must demonstrate Ireland's intention and capacity to enhance climate action in line with its commitments under the Paris Agreement.**

In the following sections, we address detailed aspects of the Plan and make recommendations for concrete changes that should be made.

5. Does the NMP commence the phase out of fossil fuels?

The current overarching vision of Ireland's energy policy, as articulated in the 2015 White Paper, is to become zero carbon with a concrete target of an 80 - 95% reduction in annual greenhouse gas emissions from the energy sector by 2050 (relative to 1990 levels). Ireland has an abundance of renewable energy and can become a major beneficiary of the global shift towards carbon-free economies.[40] While domestic renewable energy sources have increased in Ireland, it is clear the overall contribution from renewable energy remains low.[41] Currently Ireland relies on imported fossil fuels for about 85% of its energy needs, and within the electricity sector about 75% of Ireland's electricity is generated using coal, gas and peat.

[40] Environmental Protection Agency. *Ireland's Sustainable Energy*. Available at: https://www.epa.ie/media/epa_factsheet_energy_v2.pdf

[41] Sustainable Energy Authority of Ireland (2016) *Energy in Ireland 1990-2015*. Available at: http://www.seai.ie/Publications/Statistics_Publications/Energy_in_Ireland/Energy-in-Ireland-1990-2015.pdf

Analysis by financial analysts in the City of London showed that to comply with the Paris Agreement up to 80% of fossil fuel reserves owned by fossil fuel companies must not be burned.[42] Furthermore, 2016 research indicated that full exploitation of currently operating fields will not be possible if temperature limits adopted in the Paris Agreement are to be adhered to.[43]

While the draft NMP acknowledges the need to diversify Ireland's renewable sector and to phase out energy from peat and coal, there is no clear outline provided on *how* and *when* these objectives will be achieved: no new actions are adopted for decarbonising electricity generation, no fixed decision is made regarding the future of Moneypoint,[44] and no measures are included regarding the termination of peat harvesting for electricity generation before 2030.

In their analysis of the NMP, the IIEA (2017) point to the United Kingdom's Department for Business, Energy and Industrial Strategy's proposals for the UK's energy system in 2035 as a relevant example that could be drawn upon by Ireland in addressing similar challenges.[45] 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, however clarity is urgently required.[46]

> **Recommendation: From a climate action perspective, it is necessary that clarity be provided that the objective of this roadmap must be to move Moneypoint**

[42] Carbon Tracker Initiative (2014) *Unburnable Carbon – Are the world's financial markets carrying a carbon bubble?* Available at: http://www.carbontracker.org/wp-content/uploads/2014/09/Unburnable-Carbon-Full-rev2-1.pdf

[43] Oil Change International (2016) *The Sky's Limit: Why the Paris Climate Goals require a managed decline of fossil fuel production*. Available at: http://priceofoil.org/content/uploads/2016/09/OCI_the_skys_limit_2016_FINAL_2.pdf

[44] 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.

[45] Curtin, J. (2017) An Assessment of Ireland's First Draft Mitigation Plan: Does it lay solid foundations for Low-Carbon Development? Available at: http://www.iiea.com/ftp/Publications/2017/IIEA_National%20Mitigaton%20Plan%20Assessment%20Report_2017.pdf

[46] See: http://www.dccae.gov.ie/documents/SEA%20Environmental%20Report.pdf

away from coal burning. We also support a 2016 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.[47] Furthermore, the NMP should recommend a ban on future exploration for fossil fuels in Ireland (including territorial waters).

Commitment to the preparation of options for the removal of fossil fuel subsidies in the draft Plan is welcome. The progressive elimination of subsidies to fossil fuel energy can facilitate a shift to significant emissions reductions at a low social cost.[48] Financial subsidies should be redirected to investments in renewable energy and low carbon development and sustainable, progressive energy poverty alleviation. There is considerable need for a plan however, on how to respond to the social and economic needs of individuals and communities affected by the phasing out of fossil fuels. A cross-agency task force (as is often created when large multinational employers close down) supported by political initiative and engagement and charged with the responsibility of identifying alternative, good quality, sustainable job opportunities for affected communities would help minimise and avert the impending impact on employment. Shifting subsidies into other policies and sectors is essential to progress a sustainable approach to energy poverty, provide retraining and alternative jobs to replace those that must be phased out, and renewable-based energy security.

Recommendation: We support the recommendation from the IIEA (2017) that individual climate policies be socially and rurally proofed and that Government commit to proactively manage impacts and smooth the transition for affected workers, enterprises and communities.[49]

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[47] 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.

[48] Somanathan E, Sterner T, Sugiyama T, Chimanikire D, Dubash NK, Essandoh-Yeddu JK, Fifita S, Goulder L, et al. (2014). Chapter 15 - National and sub-national policies and institutions. In: *Climate Change 2014: Mitigation of Climate Change. IPCC Working Group III Contribution to AR5.* Eds. In, , Cambridge University Press

[49] Curtin, J. (2017) An Assessment of Ireland's First Draft Mitigation Plan: Does it lay solid foundations for Low-Carbon Development? Available at: http://www.iiea.com/ftp/Publications/2017/IIEA_National%20Mitigaton%20Plan%20Assessment%20Report_2017.pdf

We welcomed the passage of the Fossil Fuel Divestment Bill to Third Stage in January this year. 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.

> **Recommendation: 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 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.**

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

The 2015 White Paper on energy recognises the scale of the challenge of transitioning our energy system to zero carbon, and in particular, acknowledges the importance of citizen and community participation in the transition process. While local opposition can present a significant barrier to the expansion of the renewable sector in Ireland,[50] communities can also play a considerable and positive role in the transition to a low carbon society.[51] As the draft Plan rightly acknowledges, if emission reduction targets are to be met, increased societal enablement and engagement in mitigation is essential.

However, 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 fail to realise the

[50] Loring, J. (2007) 'Wind Energy planning in England, Wales and Denmark: Factors influencing project successes'. *Energy Policy* 35(4): 2648 – 2660.

[51] Middlemiss, L.K. and Parrish, B. (2010) 'Building capacity for low-carbon communities: The role of grassroots initiatives'. *Energy Policy*, 38(12): 7559-7566.

principle of having citizens '*at the centre of the transition and the energy industry*.[52] Community ownership is central to achieving public acceptance of renewable energy projects and towards climate policy more generally, and a change in development model to encompass community ownership helps foster a positive effect on public attitudes.[53,54] While the draft plan acknowledges it is considering price support for micro-generation, there is no clear indication of any plan to establish a framework for community ownership, as is the case in other European countries. There has been a significant increase in recent years in renewable generation; nevertheless, local communities in Ireland own less than 0.3% of this. This contrasts sharply with other European countries – such as Germany – where 1.5 million citizens generate solar electricity on their roofs and in their communities and where households own over 50% of all renewable energy.

Currently in Ireland, there is no national strategy for community energy. Energy policy provides little regard to the potential role of community energy, and provides no clear incentive to support the development of community energy in Ireland. There is no guaranteed Feed-in-Tariff offered for exporting small scale electricity generation to the grid.

The draft Plan asks how community engagement and acceptance can be enhanced and what other renewable technologies might be considered to progress the transition to a low carbon society. In response to this question, we contend that there is scope for significant investment in solar power generation in Ireland.[55] Solar power offers a unique opportunity to provide diversity in electricity generation and for citizens and communities to participate in and take

[52] In 2014, a NESC report recommended that as part of Ireland's national transition, '*national policy needs to create a framework that, in the first instance, opens possibilities at local level, assists inclusive exploration of those possibilities and brings the resulting settlement onto a national process of benchmarking and learning*'. Engagement needs to go beyond helping communities 'engage in the planning process.' (National Economic and Social Council (2014) Report 139: Wind Energy in Ireland: Building Community Engagement and Social Support. Available at: http://www.nesc.ie/en/news-events/news/press-releases/latest/nesc-publishes-report-139-wind-energy-in-ireland-building-community-engagement-and-social-support/)

[53] Warren, C. and McFadyen, M. (2010) Does community ownership affect public attitudes to wind energy? A case study from southwest Scotland. *Land Use Policy*, 27(2): 204-213.

[54] Enevoldsen, P. and Sovacool, B. (2016) Examining the social acceptance of wind energy: Practical guidelines for onshore wind project development in France. *Renewable and Sustainable Energy Reviews*, 53: 178-184.

[55] In the United Kingdom, 10 GW of solar power has been deployed since 2010. In Ireland, where a solar panel will perform as well as in the UK or Germany, there is only 2 MW of solar electricity installed.

ownership of the renewable transition. Households and communities could reduce their demand for fossil fuel electricity, lower their energy bills, and generate an income from the excess clean energy they produce. Without a guaranteed payment for micro-generation, including solar, however, this "rooftop revolution" will not happen in Ireland. To date, over 60 TDs and Senators have written to Minister Naughten supporting calls for a fair price for micro-generation and solar electricity. [56]

> **Recommendation: 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.**

7. 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. Incentives in recent years to change from petrol to diesel in the private car fleet have created significant air quality problems, especially in urban areas, and incentives are now required not only to encourage users to switch to electric vehicles, but also to use alternative modes of transport.[57]

In 2009, the Government adopted *Smarter Travel* as national policy.[58] The policy included the following targets to be achieved by 2020:

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[56] A copy of this letter is available at:http://www.stopclimatechaos.ie/download/pdf/letter_to_minister_naughten_on_payment_for_solar_elctricity.pdf

[57] See: https://www.epa.ie/media/Chapter10_Environment_Transport.pdf

[58] Department of Transport. (2009) Smarter Travel: A Sustainable Transport Future. A New Transport Policy for Ireland 2009-2020. Stationery Office: Dublin. Available at: http://www.smartertravel.ie/sites/default/files/uploads/2012_12_27_Smarter_Travel_english_PN_WEB%5B1%5D.pdf

- 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 NMP fails to address how the objectives of the *Smarter Travel* policy will be achieved. For example, the NMP includes no outline of how it intends to bridge the gap between the current rate of 3% of all journeys being made by bike, and the 2020 target of 10%.

> **Recommendation: To achieve the objectives of Smarter Travel, we recommends that the NMP rebalance existing funding away from road infrastructure and prioritise investment in walking, utility cycling and clean, sustainable public transport. As well as reducing emissions, redirecting existing funding will create benefits for public health, cleaner air, and improved public spaces.**[59]

We welcome a number of initiatives identified in the NMP, for example, expansion of the Bike to Work Scheme, the development of a task-force for electric vehicles, and a review of national parking. We are concerned however, that the current plan is weak on reducing the level of dependency on private car ownership as the primary means of travel, and instead, over-relies on technological progression and biofuels to decarbonise transport. This wait-and-see approach amplifies policy uncertainty and instability. Furthermore, the reliance on private transport fails to address persistent problems related to congestion. In their policy brief on the mitigation Plan, the IIEA supports the recommendation that the case be made for further investment in public transport in the Capital Review process. They argue the point that the

[59] 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.

current emphasis on increased investment in road infrastructure is '*incompatible with decarbonisation*'.[60]

In a number of instances, the draft Plan refers to increased use of biofuels and expansion of the Biofuels Obligation Scheme as a means of decarbonising transport. In the SEA Report accompanying the draft NMP it is acknowledged that while biofuels may have an important role to play, biofuel cultivation can result in negative land use change, erode food security, contribute to biodiversity loss and still involve very significant (and poorly monitored or verified) lifecycle emissions. How these concerns can be addressed in a way that is socially and environmentally just needs to be considered in the final NMP.

> **Recommendation: 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.** [61]

The introduction of cleaner, low emission public transport is a vital component of a low carbon transport future, both through the reduction of emissions, and by replacing car journeys through modal shift. For public transport, conversion to electric power makes sense, with inbuilt air quality improvements. Other sustainable options may include the use of bio-methane, a lower carbon form of natural gas produced by the decomposition of organic waste material via anaerobic digestion (such as municipal waste, or farm slurry) - an already prevalent source of fuel in a number of European cities. The UK's Low Carbon Vehicle Partnership Green Bus Initiative provides some useful examples of what can be implemented in Ireland.

[60] Curtin, J. (2017) An Assessment of Ireland's First Draft Mitigation Plan: Does it lay solid foundations for Low-Carbon Development? Available at: http://www.iiea.com/ftp/Publications/2017/IIEA_National%20Mitigaton%20Plan%20Assessment%20Report_2017.pdf

[61] This commitment would specifically require zone, distance, or time-based fares spanning arbitrary transfers between modes and transport operators. The current "integrated ticketing" approach eases the administrative burden for operators, public and private, but is not passenger-centred and in practice results in multiple, separate fares for discrete elements of what is, in fact, a single passenger journey.

Recommendation: We recommend that the NMP support the conversion of public transport vehicles to sustainable energy sources.

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

The national objective is that total annual emissions from agriculture in 2050 will be no more than what is absorbed annually by Ireland's carbon sinks (i.e., forests, peatlands, and grasslands). In their brief on the NMP, the IIEA (2017) details how under current projections to 2030, the agriculture sector could take up over 51% of Ireland's total carbon budget, leaving little scope for manoeuvre or flexibility in other sectors.[62]

There has been no substantive discussion within Irish society on the current policy push towards intensification. This is despite the wider implications and challenges created for addressing Ireland's climate challenge. Furthermore, the option of reducing emissions by decreasing herd sizes and directing and diversifying farming away from non-sustainable models has not been promoted as a viable policy option. The CCAC (2016) have advised that the agriculture sector (in combination with forestry and other land-use categories) will need to determine a pathway to achieving its 2050 objective, and the NMP should include a timeline for the expected implementation of solutions. This pathway needs to encompass significant actions to reduce emissions and increase carbon uptake in a sustainable way.

Recommendation: To sufficiently off-set agricultural emissions, the NMP needs to outline what an environmentally and socially sustainable level of carbon sink is, while giving considerations to biodiversity, recreation and agriculture.

The draft NMP outlines how the agricultural sector in Ireland is significant to the sustainable development of a rural economy and therefore must be balanced with the environmental objective of reducing emissions. This appeal to "balance" posits an entirely false dichotomy, assuming emissions reductions and a resilient rural economy are inherently in conflict. It fails

[62] Curtin, J. (2017) An Assessment of Ireland's First Draft Mitigation Plan: Does it lay solid foundations for Low-Carbon Development? Available at: http://www.iiea.com/ftp/Publications/2017/IIEA_National%20Mitigaton%20Plan%20Assessment%20Report_2017.pdf

to recognise the importance of diversification within a rural economy. It is also based on the premise that the current, dominant model of farming in Ireland is economically and environmentally sustainable. Yet, this model is heavily dependent upon policy and incentive structures and a considerable proportion of Irish farms are economically vulnerable and non-viable without current subsidies. The Government should be encouraging an economically smart pathway for agriculture and the rural economy by promoting sustainable land use diversification.

> **Recommendation: We have argued that Ireland's current agriculture and land-use policy is neither 'climate-smart' nor sustainable, and Ireland should be supporting farmers to transition away from ruminant production to a more sustainable model of farming. This can be achieved by encouraging High Nature Value farming, incentivising low carbon farming and promoting and supporting healthier and less ecologically damaging human diets.**[63]

The NMP refers to the use of forestry and bio-energy as suggested offsets for agriculture-related greenhouse gases. 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. We have argued that 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.[64] If incorrectly sited, widespread afforestation, which creates fundamental changes in ecosystem function and structure, can present threats to elements of Ireland's biodiversity and aquatic systems over the long-term.[65,66] Forest policy needs to be equally cognisant of the far-reaching

[63] See: Stop Climate Chaos/Environmental Pillar (2016) *Not So Green: Debunking the Myths Around Irish Agriculture*. Available at: http://www.stopclimatechaos.ie/download/pdf/not_so_green.pdf

[64] Mackey, B. et al (2013) Untangling the confusion around land carbon science and climate change mitigation policy, *Nature Climate Change*, 3, 522.

[65] Graham, C., Irwin, S., Wilson, M., Kelly, T., Gittings, T. and O'Halloran, J. (2013) Tracking the impact of affectation on bird communities *Irish Forestry*. Available at: https://www.ucc.ie/en/media/research/planforbio/pdfs/09-Grahametal2013.pdf

environmental implications of afforestation alongside the social and economic impacts; structural diversity of forestry is important.

> **<u>Recommendation:</u> The draft mitigation plan asks if there are policies and abatement strategies that should be considered as levers to develop an approach to carbon neutrality. Peatland restoration is surprisingly omitted from the draft Plan. Restoring Ireland's peatlands as a means of emissions reduction and carbon storage is an obvious measure which should be included in the final mitigation plan.**

Because of peat extraction, disturbance, and related activities (e.g., combustion, horticulture), Irish peatlands (most of which are moderately or severely damaged) have become a source of carbon emissions. In their healthy state, peatlands will not only store carbon, but also continue to absorb CO_2 as they expand. In Ireland, near intact peatlands may actively sequester, on average, 57,402 tonnes of carbon per year.[67] For this potential to be realised however, stronger enforcement to protect peatlands, rewetting and restoration, and using alternative non-peat sources for energy production will be required. Based on the recognition of the value of peatlands as long-term carbon sinks, Scotland's Draft Climate Change Plan (2017-2032) includes target-driven plans for peatland restoration. A similar approach can easily be adopted in Ireland.

> **<u>Recommendation:</u> We have previously argued that if adequately managed, sequestered carbon in peatlands could provide a cheap mitigation measure, and produce important income in terms of agri-climate environmental measures under the Rural Development Plan Regulations.[68] Such measures can be complementary**

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[66] Ormerod, SJ, O'Halloran, Gribbin, SD & Tyler, SJ (1991) The ecology of Dippers Cincluscinclus in relation to stream acidity in upland Wales; Breeding performance, Calcium physiology and nestling growth. *Journal of Applied Ecology*, 28:419-433.

[67] Wilson, D. Müller, C., and Renou-Wilson, F. (2013) Carbon emissions and removals from Irish peatlands: present trends and future mitigation measures. *Irish Geography*, Vol. 46(1-2): 1-23.

[68] See: Stop Climate Chaos/Environmental Pillar (2016) *Not So Green: Debunking the Myths Around Irish Agriculture*. Available at: http://www.stopclimatechaos.ie/download/pdf/not_so_green.pdf

to other environmental obligations, such as the Birds Directive and commitments under the National Peatland Strategy and the EU Biodiversity Strategy.

9. Conclusion

The non-negotiable nature of the physics of climate change and the imperative for the State to protect its citizens from preventable harm clearly require that ambitious and equitable policies and measures towards decarbonisation need to be implemented without delay, even where this involves difficult political decisions and challenging policy contexts. In this submission on the draft National Mitigation Plan, the Coalition has welcomed a number of discrete new proposals – which should be strengthened further – and has expressed concerns, and made a number of explicit recommendations to help strengthen Ireland's mitigation policy framework going forward. Above all, this submission has sought to demonstrate that the draft Plan cannot be considered acceptable – in terms of ambition towards meeting Ireland's national and international climate and energy commitments – nor in relation to the task assigned to it under Ireland's Climate Action and Low Carbon Development Act (2015). The proposed approach to policy planning, the level of ambition, and how climate action is framed require fundamental changes.

Ireland cannot afford to adopt a wait-and-see climate policy approach. The framework adopted within the current draft ignores climate science, underestimates the long-term climate risks, and will only suffice to limit the national conversation on climate change in Ireland by distracting attention away from Ireland's climate responsibilities and the significant economic and human costs resulting from a failure to take action. Every year of delay in reaching the 5% annual reduction rate – as outlined in this submission – increases the challenge over the long-term, drives up the cost of transition and undermines Ireland's opportunity to benefit from the emergence of the green global economy. Most importantly, it signals an absence of intent to honour commitments to international partners to deliver on the Paris Agreement, and a profound lack of solidarity and respect for the countries and communities for whom current climate impacts are already too much.

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

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[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.