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Submission to:

The Oireachtas Joint Committee on Environment, Culture and the Gaeltacht on the Outline Heads of the Climate Action & Low Carbon Development Bill – April 2013

From:

Solid Fuel Trade Group (SFTG)

Date April 29th 2013

Introduction:

SFTG welcome the publication of the Outline Heads of the Climate Action & Low Carbon Development Bill.

SFTG was originally formed nearly 2 decades ago and is the representative body for the majority of the solid fuel industry in Ireland, and its members account for over two thirds of all solid fuel sales in the marketplace on the island of Ireland.

SFTG has a long & proven record of engagement with Government in the area of air quality. SFTG took the progressive step of entering into a voluntary agreement with Government in 2002 to drive down & limit the sulphur content of Bituminous Coal to 0.7%, and Petroleum Coke to 2%.

This agreement was subsequently renewed in 2008 & the significant air quality improvements delivered by the SFTG were recognised & eventually enshrined in legislation with the introduction S.I. No. 326 of 2012 by Minister Hogan. SFTG was also formally engaged in the formulation and introduction of SWIFT 7 in order to facilitate with EPA & NSAI, the designing of an appropriate labelling scheme for solid fuel baggers.

SFTG in this submission records its continued willingness to participate, and contribute to the development of draft plans at National and Sectoral level through the Expert Advisory Body.

Executive Summary:

The Committee has published Draft Heads of the Climate Action and Low Carbon Development Bill 2013 (the draft). In the draft, the process of developing a National and Sectoral roadmaps is outlined, with an accompanying timescale. A key input to the development of the roadmaps will be the formation of the Expert Advisory Body, comprising representatives from EPA, SEAI, ESRI, and Teagasc, and others as the Minister chooses up to a maximum of seven participants.

SFTG as a key stakeholder in the provision of heat into the domestic sector is well placed and can contribute meaningfully to the formation of both the National and Sectoral planning process through the Expert Advisory Body, and this submission is to place our willingness to participate and be part of the process of developing the draft National and Sectoral plans on record.

Recommendations:

That SFTG will contribute to the process of developing the Draft National and Sectoral roadmaps, through participation in the Expert Advisory Body.

Submission:

SFTG welcomes the publication of the Draft Heads of the Climate Action and Low Carbon Development Bill 2013. SFTG recognises Ireland's commitment to reduce non ETS emissions by 20% compare to the 2005 baseline by 2020.

SFTG believes it is important that the process of developing roadmaps at National and Sectoral level will give clarity to the contribution each sector must make to achieve the objectives. The concept of Burden Sharing is critical if the targets are to be reached, - no one sector can achieve or be expected to achieve the national targets alone.

It is important that Ireland reaches its objectives, as noted in Head 8 Paragraph 2 (c), of emission reductions in the most cost effective ways. SFTG interprets cost effective to include cost to consumers, the economy and employment.

SFTG has played its role over the past two decades in contributing to the improvement of Air Quality and reduction in greenhouse gas emissions. SFTG members are obligated under the Better Energy Scheme to contribute to and fund improvements in energy efficiency, thereby reducing the output of greenhouse gas.

SFTG can contribute to the development of National and Sectoral roadmaps, from a position of expertise in the solid fuel industry. SFTG is willing to contribute to the formation of draft, and final National and Sectoral Roadmaps, through the Expert Advisory Body.



Patrick Downes

Chairman

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29th April 2013

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