



BirdWatchIreland
protecting birds and biodiversity

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Eugene Ó Cruadhlaioich Uasal,
Cléireach don Choiste,
Oireachtas Joint Committee on Environment, Culture and the Gaeltacht,
Kildare House,
Kildare Street,
Baile Átha Cliath 2.

30th April 2013

BirdWatch Ireland Submission to Oireachtas Joint Committee on the Environment, Culture and the Gaeltacht on the Climate Action and Low Carbon Development Bill 2013

Dear Mr. Ó Cruadhlaioich Uasal,

BirdWatch Ireland welcomes the opportunity to comment on the Climate Action and Low Carbon Development Bill. BirdWatch Ireland is Ireland's largest environmental NGO and is a science based conservation charity with 15,000 members, a team of professional staff and 2,000 active volunteers. BirdWatch Ireland has been actively engaging in the issue of Climate change for more than 10 years, seeking action on climate change mitigation and adaptation from all relevant sectors of society.

Climate change and biodiversity loss are the greatest threats to human society and the environment. Strong climate legislation which underpins a comprehensive strategy for emission reductions in Ireland is required. This legislation and strategy should lay out how we are to achieve cuts from all sectors over set timeframes and should focus immediately on achieving energy savings across the economy. Without urgent action we will experience both devastating consequences for humans and significant risk of extinction of thousands of species.

In order to effect the emissions cuts necessitated by most up to date climate science, BirdWatch Ireland considers it necessary to set binding emissions reductions targets in the short and medium term for all sectors as well as adopting nature based solutions to Climate change mitigation and adaptation.

We hope most sincerely that this submission will be taken on board and we will be happy to discuss this in more detail with you and the committee and to answer any queries that may arise.

Sincerely

Anja Murray

Policy & Advocacy Team
BirdWatch Ireland



Directors: K. O'Byrne (Chairman) J Cromie, B Lavery, J O'Halloran, JB Peart, SP Roche, J. Wilson

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In order to have an effective Bill the Oireachtas must:

- Insert a 2050 target of a 80-95% reduction in greenhouse gas emissions into the Climate Bill
- Include references to protection of the environment (explicitly biodiversity) and require that no damage to valuable ecosystems shall arise from mitigation and adaptation strategies
- Introduce an obligation on relevant departments and state agencies to develop ecosystem-based approaches to conserve and enhance natural carbon sequestration
- Ensure that the Expert Advisory Body is given sufficient powers and capacity to operate as an effective and strong advocate of strong climate policy, including by ensuring adequate expertise within the Body and by giving it the power to publish its own reports
- Include a requirement for low carbon roadmaps every 5 years which contain carbon budgets
- Insert the principle of Climate Justice into the Bill

In order to support the shift towards a low-carbon economy in all sectors

1. Particular attention should be paid to ensuring that development of renewable energies avoid negative environmental impacts, including ensuring that bioenergy crops do not harm the natural environment (e.g. biofuel crops and short rotation coppices) and greater efforts are made to ensure that conservation targets and renewable energy development targets do not continue to clash.
2. An obligation should be placed on the relevant departments to develop ecosystem-based approaches to conserve and enhance natural carbon sequestration. Near intact peatlands in Ireland may actively sequester, on average, 57,402 tonnes of carbon per year. However, due to the damaged nature of most Irish peatlands, they



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are a large net source of carbon, estimated currently at around 2.64 million tonnes of carbon per year. The shift towards a low carbon economy and reduction of carbon emissions, effort should be concentrated on restoring or capping the carbon loss from peatlands. This will be far more effective than focusing on increasing the production of bio fuels, for example, or attempting to offset with forestry. Grasslands and healthy soils are also important stores and sinks of carbon and greater effort is needed to ensure these functions are maintained and enhanced.

Biodiversity and Nature Based Solutions to Climate Change mitigation and adaptation

Climate change policy is connected to many different areas of society, the economy and the environment. Climate change is a major threat to biodiversity and ecosystem services. While some responses to climate change (both mitigation and adaptation) have major environmental co-benefits, others could have negative impacts especially if implemented badly. **Reference to protection of the environment (explicitly biodiversity) should be included in the legislation.**

Peat Bogs and Climate Change

Bogs store huge quantities of carbon and healthy and intact peat bogs remove carbon from the atmosphere by actively absorbing atmospheric carbon as peat grows. However, this valuable function is reversed when peatlands are damaged, with degraded peatlands releasing stored carbon as carbon dioxide in to the atmosphere and thus adding to greenhouse gas emissions and climate change. In Ireland, near intact peatlands may actively sequester, on average, 57,402 tonnes of carbon per year. However, due to the damaged nature of most Irish peatlands, they are a large net source of carbon, estimated currently at around 2.64 million tonnes of carbon per year¹. Damage occurs through burning, overgrazing, turf cutting and drainage for conversion to other land uses which require addressing as part of the Climate Bill.

Conservation and management of peatlands is a pressing priority for mitigating against climate change. The key management objective for climate change considerations is to keep peatlands wet – peat is formed because of wet conditions and when the peat dries out it begins to decompose, releasing greenhouse gasses. Drainage, peat extraction, afforestation and other activities which lower the water table act against the ability of peat to counter

¹ Renou-Wilson et al.; 'BOGLAND: Sustainable Management of Peatlands in Ireland' EPA 2011 available to download at <http://www.epa.ie/downloads/pubs/research/land/name.31495.en.html>



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climate change. According to Achim Steiner, UN under secretary general, “**restoration of peatlands is low hanging fruit, and among the most cost effective options for mitigating climate change**”. If Ireland is to meaningfully reduce carbon emissions, then in the first instance and as a priority, significant effort should be concentrated on restoring or capping the carbon loss from peatland. This will be far more effective than focusing on increasing the production of bio fuels, for example, or attempting to offset with forestry.

Emissions Reduction Targets

Given Ireland is already committed to EU and international targets, supporting these with national legislation is necessary to provide clarity and substance to all sectors. Specifically a target for 2020 which covers all of the economy, not just emissions included in the EU ETS, should be included in the Bill will assist delivery of the 2050 target and set Ireland in the right Direction to achieving the longer term target of 2050. Quantifiable targets are the only way to ensure accountability. They act as a clear benchmark against which to measure progress. Only a numeric target can be clear.

A 2050 target is yet to be agreed at the European level but the European Council Heads of Government has stated as an EU objective the need to cut emissions by 80-95% by 2050. This is in line with the science, which states that emissions in developed countries should be reduced by the order of 80%-95% by 2050 if we are to avoid dangerous climate change (IPCC, 2007). **A 2050 target of 80-95% should be inserted to ensure Ireland is playing its part. Leaving targets out of the climate change bill threatens to undermine the fundamental role of this critical piece of legislation.**

Promoting climate change adaptation and risk prevention and management

The Bill should enable and require where possible ecosystem based approaches to Climate Change mitigation and adaptation be adopted by responsible authorities. Such approaches include:

1. planning and designing landscape-scale adaptation strategies for wildlife, emphasizing the role of biodiversity and the Natura 2000 network in nature based approaches to climate change mitigation and adaptation;
1. supporting approaches to flood prevention and management which recognise the importance of wetlands for flood attenuation and accordingly support restoration and management of wetland habitats including floodplain wetlands;
2. managing buffer zones around coastal and wetland Natura 2000 sites to allow for movement of species and habitats in response to sea level rise & coastal squeeze;



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3. reducing soil sealing by improving spatial planning, in particular in coastal areas and floodplains;
4. increasing resilience of the forestry sector by incorporating continuous cover and diverse forest management systems which are more resistant to drought, fire and pests thus allowing continued productivity from forests in the face of climate change;
5. increasing resilience of urban and sub-urban areas by developing multifunctional green infrastructures (e.g. woodland areas, agroforestry systems, and wetlands);
6. improving soil management through support for practices to prevent soil degradation and depletion of soil carbon stocks;
7. leading on establishing clear and binding targets for energy efficiency
8. establish a new legal framework for renewable that ensures sustainability standards for all energy components.

BirdWatch Ireland also would like to reiterate the Stop Climate Chaos submission to this consultation and reiterate the need for accountability and transparency of the expert advisory body and the power for it to publish its own reports; the need for low carbon roadmaps to be produced at a minimum of every 5 years and to include carbon budgets for all sectors; and the importance of reflecting climate justice in the bill.

END

For further information contact: Anja Murray, Policy and Advocacy Team, BirdWatch Ireland, Unit 20 Block D, Bullford Business Campus, Kilcoole, County Wicklow, Ireland; e-mail: amurray@birdwatchireland.ie