

## **Christian Aid Submission**

### **1. Introduction**

1.1 Christian Aid Ireland is an aid agency working to overcome poverty in some of the world's poorest communities in around 50 countries. Regardless of race or religion, we help people to tackle the problems they face and build the life they deserve. We act where there is great need, regardless of religion, helping people to live a full life, free from poverty. We provide urgent, practical and effective assistance in tackling the root causes of poverty as well as its effects. At home and overseas we also campaign to change the structures that keep people poor, challenging inequality and injustice.

1.2 Christian Aid has been actively campaigning on climate change from a development context for a number of years. The effect of climate change is already being felt by those in developing countries, those least able to deal with it. It is the poorest people who are on the frontline of climate change: their livelihoods are often dependent on subsistence agriculture, while the places in which some of them live are vulnerable to drought, high winds or rising sea levels. A changing climate adds further risk and unpredictability to lives that are already lived on the edge.

1.3 The science of climate change is beyond doubt: observation tells us the world is warming. Global average temperatures, calculated from networks of weather stations around the world, show a persistent warming trend. The Earth's average temperature has increased by 0.75°C over the past 100 years. Eleven of the 12 years from 1995 to 2006 are among the 12 warmest years on record.<sup>1</sup> Studies by NASA's Earth Observatory predict temperature rises of 6°C by the end of this century.<sup>2</sup>

1.4 The UK Meteorological Office analysis of even a 4°C rise predicts impacts such as:

- Crop yields declining for all major cereal crops, causing a 10-20 per cent increase in the numbers of people at risk of hunger
- Three billion people exposed to water stress (limited access to fresh water)
- Sea-level rise of up to 80cm by 2100, affecting hundreds of millions of people, and much greater sea-level rise after that
- Significant increase in drought – one credible analysis suggests that half of all land surfaces could become subject to moderate drought conditions, and extreme drought might rise from affecting 1 per cent of land surface to around 30 per cent.

1.5 Recently, three of our partners based in Tanzania, Kenya and a pan-African Climate Justice Alliance appeared before the Environment Committee to discuss the impact of climate change on developing countries, specifically in terms of food

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<sup>1</sup> UK Met Office HadCRUT3 temperature record

<sup>2</sup> NASA Earth Observatory

and water security. The partners bore witness to the Committee of food and water shortages resulting from long term changes in weather conditions. They stressed not only global obligations, nor alone the West's obligations, but rather specifically referred to Ireland's obligations, and the need for Ireland to implement strong climate change legislation. They said Africans were looking to Ireland among industrialised countries to mitigate the effects of climate change.

1.6 Christian Aid's recent attendance at the Hunger Nutrition and Climate Justice Conference in Dublin highlighted the urgency of action on climate change. At the Conference, key policymakers from Europe were joined by local activists and workers from developing countries to hear testimony on the current effects of climate change. The necessity to take action now and not defer the problem into the future was a key point highlighted at the Conference.

## **2. Executive Summary**

2.1 The overall goals of Ireland's climate change policy must be a reduction in greenhouse gas emissions. Ireland has one of the highest rates of emissions per capita in the developed world. Climate policy must ensure that all government departments respond to climate obligations with tangible plans and results.

2.2 Recent projections by the Environmental Protection Agency show that Ireland will not meet its EU 2020 Greenhouse Gas emissions targets. In the best case scenario provided by the EPA, Ireland will breach its 2020 targets from 2016. However these are based on current emissions policies. Inserting emissions reduction targets for beyond 2020, for 2030 and 2050, would set a strong standard for governments to comply with, and would result in a shift in policies to meet those targets.

2.3 While we welcome the long-awaited introduction of legislation on climate change, Christian Aid feels strongly that the Climate Change Bill in its present form is not sufficiently strong to be an effective policy instrument. The central reason for this is the lack of specific domestic targets in the legislation. Without targets, the Bill represents a mere token effort. The legislation cannot be taken seriously as a policy tool if it does not provide the compulsion that only a bill with targets can bring about.

2.4 During widespread and extensive consultations carried out by the Department of the Environment in the last two years in the preparation for the Heads of Bill, 90% of those consulted expressed support for targets for 2030 and 2050 to be enshrined in legislation. Given this large consensus around including targets in legislation, we find it difficult to understand why they have not been included in the Bill. To simply wait and hope for targets to be set at EU level would be to miss the opportunity for Ireland to do like the UK and Scotland have done – bring in

domestic legislation that enshrines statutory targets for emissions reduction. The recent information from the EPA, as mentioned above, that Ireland is on course to miss even its EU targets for 2020, reiterates the need for domestic and not just European targets.

### **3. Recommendations**

Christian Aid recommends the following proposals be taken into consideration by the Oireachtas Joint Committee on the Environment, Culture and the Gaeltacht.

- a. Insert a 2050 target of an 80-95% reduction in greenhouse gas emissions into the Climate Bill
- b. Ensure the Expert Advisory Body has a respected and effective independent role within climate policymaking and implementation, including by giving it the power to publish its own reports
- c. Ensure the low carbon roadmaps every 5 years and ensure they contain carbon budgets
- d. Insert the principle of Climate Justice into the Bill

### **4. Main Proposals**

#### **International Comparison**

##### **4.1.1 UK**

The UK Climate Change Act 2008 set out a requirement to reduce greenhouse gas emission by 80% by 2050, from 1990 levels. It set out five year legally binding carbon budgets, and set up a Climate Change Committee, an independent advisory body which counsels the UK and Scottish governments on implementation of climate change targets, and – importantly – produces publicly available progress reports.

##### **4.1.2 Scotland**

In 2009 the Scottish Government passed the Climate Change (Scotland) Act, a progressive, radical and far-reaching climate change policy, in a country with similar challenges to Ireland in terms of agriculture having a large share of the economy. The legislation sets a 42% target for emissions reductions for 2020, and an 80% reductions target for 2050. These are achieved through a framework of annual targets. The government leans on the UK Committee on Climate Change for independent expert advice and to monitor the government's progress on meeting climate change targets. The legislation places strict duties on Ministers to report to Parliament on whether they have

met annual targets and if not, to explain the case. In addition Ministers must set out proposals and policies for meeting targets. It places a duty on public bodies, and sets out provisions on carbon assessment. It is one of the only pieces of climate change legislation that requires the government to set out what share of greenhouse gas emissions is the result of the consumption and use of goods and services in Scotland for that year.<sup>3</sup>

- 4.1.3 We believe that the Scottish legislation in particular demonstrates the feasibility and necessity of implementing progressive and radical climate change policy in a country with a similar population and economic structure as Ireland. There can be no excuses that Ireland should await requirements from EU level. There is no reason why, if so similar a jurisdiction as Scotland has taken such a bold step towards action on climate change, the same cannot be done in this jurisdiction.

## Targets

- 4.2.1 The absence of targets in the proposed legislation betrays a lack of urgency and ambition on the part of the government towards the climate crisis, and undermines our claims internationally to be a leading voice on the hunger nutrition and climate change nexus. The programme for government committed to provide 'certainty surrounding government policy and a clear pathway for emission reductions'. Short and long term targets provide the certainty needed by investors, both businesses and householders, to invest now in low-carbon technology knowing that the payback will come as emissions fall and the cost of polluting rises. They also provide the impetus for timely and adequate action to cut emissions. Quantifiable targets are the only way to ensure political accountability. They act as a clear benchmark against which to measure progress. Only a numeric target can be clear. Targets are used in other areas of government policy for the same purposes – to provide political accountability, to serve as a gauge for the success or failure of a policy approach, and to impel government to take action on an issue. A powerful example of this was the successful road safety campaign, which set targets and involved the Road Safety Authority, proving the usefulness of an independent body which helps to drive change.
- 4.2.2 Given Ireland is already committed to EU and international targets, putting them into national legislation is about supporting a domestic policy cycle focused on achieving those targets and increasing transparency and accountability. **A 2020 target that covers the whole economy (and not just emissions included in the EU ETS) should be inserted to drive sector wide emission reductions. Targets for 2030 and 2040 should also be set to put**

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<sup>3</sup> Climate Change (Scotland) Act 2009

**Ireland on a trajectory for meeting the 2050 target.** Without phased targets, there is a risk that much of the emission reductions that need to be made could be left to the final hour.

- 4.2.3 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.**

### **Expert Advisory Body**

- 4.3 The Expert Advisory Body plays a key role in terms of accountability and transparency. It is crucial that the Expert Advisory Body has the power to publish its own reports. The Bill in its current formulation leaves the publication of reports to the government's discretion. In order for this legislation to be effective, **the Expert Advisory Body must have the power to publish its own reports, as is the case under the UK and Scottish Climate Change Acts.**

### **Low Carbon Roadmap**

- 4.4 **The Low Carbon Roadmap must be more frequent than every 7 years – at a minimum every 5 years.** This would align it closer to the cycle of political accountability. The Low Carbon Roadmap should also contain carbon budgets. The important difference between a target and a budget is that a target is about emissions at a single point in time, while a budget captures the total emissions over the period. While longer term targets are necessary as statements of Ireland's intention, these targets fall outside of the lifetime any government. An effective carbon budget mechanism, akin to the fiscal budget process, is essential to ensure political accountability and timely action. **A provision for the inclusion of carbon budgets in the Low Carbon Roadmap should be included.**

### **Climate Justice**

- 4.5.1 It is widely agreed that, internationally, climate change must be tackled based on the principle of common but differentiated responsibilities. Countries that have contributed most to creating climate change through higher emissions should contribute most to the effort to reduce its effects. Further, those developed countries must assist the poorest countries, those most vulnerable

to the devastating effects of climate change, with finance for adaptation and mitigation.

- 4.5.2 In rich and poor countries alike it is those who are more socially or economically marginalised who are affected most and who have the least means to cope. For many developing countries, their geographical position, dependence on rain-fed agriculture and underdeveloped physical and socio-economic infrastructure leaves them particularly vulnerable to increasingly frequent and intense weather events and slow onset changes such as increases in temperature. Finance from Western countries to assist countries on the frontline to build resilience against the effects of climate change is therefore a profoundly important principle in developing climate change policy. Ireland has already made a financial commitment towards climate finance through the UN process, and it must keep to its word. In the interest of solidarity and in the context of Ireland's strong track record in international development, **the Bill should contain the principle of climate justice.** This recognises Ireland's obligation to mitigation as well as supporting adaptation in developing countries.

## **Biodiversity**

- 4.6 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.**

References:

Christian Aid, 'Warning Signs: The Science and Impacts of Climate Change', 2010. Available at: <http://www.christianaid.org.uk/images/time-for-climate-justiceJune2010.pdf>

Christian Aid, '*The Characteristics of Effective Climate Finance*' 2011. Available at: <http://www.christianaid.org.uk/images/time-for-climate-justice-finance.pdf>

Climate Change (Scotland) Act, 2009. Available at: <http://www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/climatechangeact>

Intergovernmental Panel on Climate Change, *Synthesis Report*, 2007. Available at: [http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4\\_syr.pdf](http://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4_syr.pdf)

NASA Earth Observatory, '*How Much More Will Earth Warm?*' Accessed at: <http://earthobservatory.nasa.gov/Features/GlobalWarming/page5.php>

UK Met Office, *Hadley Centre Observation Datasets*. Available at: <http://www.metoffice.gov.uk/hadobs/hadcrut3/>