



CLIMATE ACTION AND LOW CARBON DEVELOPMENT BILL 2013

TOWARDS A SUSTAINABLE AND JUST SOCIETY:
ISSUES FOR THE COMMUNITY SECTOR

SUBMITTED BY
COMMUNITY WORKERS' CO-OPERATIVE

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THE COMMUNITY WORKERS CO-OPERATIVE



Established in 1981, the Community Workers' Co-operative (CWC) is a national organization that promotes and supports community work as a means of addressing poverty, social exclusion and inequality and ultimately as a means of achieving social change that will contribute to the creation of a more just, sustainable and equal society. The CWC is a membership organisation. There are currently approximately 800 individual and organisational members of the CWC.

The CWC is directly engaged in working with the community sector on climate change and sustainable development. We are supporting the sector's organisations to link community concerns with the national debate on climate change and sustainable development. We have conducted initial research, funded by the Environmental Protection Agency, which has established a number of areas which the State can take appropriate measures to support social inclusion, equality, human rights and sustainable development within climate change policy and legislation.

For further information please log on to www.cwc.ie or email info@cwc.ie.

Introduction

The effects of climate change will be felt most deeply by those who are living in poverty and facing inequality and social exclusion. These are communities who have contributed least to the consumption which is causing climate change and with the least resources to adapt and respond to its effects. A planned response to climate change which incorporates concerns for social inclusion, equality and human rights approach, is necessary to retain social cohesion in the transition to a low carbon economy.

Many of the measures to avoid, mitigate and adapt to climate change will have different effects on poverty and on social cohesion depending on how they are applied. These include rising energy prices; the cost of *retrofitting* or designing housing for energy conservation; increased transport costs for people and for food and goods etc. Effective planning requires social as well as environmental and energy criteria. The negative effects of climate change, caused primarily by the emissions of developed countries of the Global North, will be felt most severely in the Global South. Ireland and Europe have a moral obligation and a practical need to reduce emissions. Leadership on emissions reductions at a national and European level must underpin our commitment to human rights and global development.

We are concerned that this Bill lacks the urgency required to tackle the greatest challenge facing our planet and our country. It fails to provide for a robust institutional framework at Governmental level. The Bill must acknowledge the need for an all-Government and all-society approach, led from the top by the Taoiseach.

This submission focuses on the local and national context in Ireland and highlights the ways in which poverty, inequality and social exclusion are compounded by climate change. It outlines a number of measures which must be included in this legislation so as to protect vulnerable groups who would otherwise be disproportionately affected physically, socially and economically by climate change. These concerns and the measures which can address them include:

1. The National and Sectoral Roadmaps

We welcome the commitment to develop national and sectoral roadmaps to move to a low-carbon economy. However, the legislation should be amended to provide for adequate poverty and equality proofing measures within the National Low Carbon Roadmap and all associated policy measures. Climate related social vulnerability

studies must underpin the Bill and ensure that Government has a fuller picture of how climate change will affect communities. Mitigation efforts taken under the Bill should be guided by poverty and equality impact assessments which must be built into the sectoral roadmaps and should complement the Government's social inclusion measures.

2. Emissions Reduction Targets and the Scope of the Bill

The Bill must set out legally binding emissions reduction targets of 80% by 2050 in line with science and equity, which include emissions from the EU Emissions Trading Scheme and do not rely on carbon offsetting. This will provide for a socially inclusive, equitable and just transition to the low carbon economy.

3. The Institutional Framework

The current proposal for an Expert Advisory Body should be reconstituted as an independent Climate Change Commission. In addition to those duties set out in the bill for the Body, an enhanced Commission should be mandated to take into account human rights, equality and social inclusion in its work.

However the responsibility for the management of the processes should rest with Government, with the Taoiseach taking responsibility and providing leadership on climate change.

1. The National and Sectoral Roadmaps

The National Low Carbon Roadmap envisaged in the Bill sets out to articulate a national vision for a low carbon, climate resilient and environmentally sustainable economy which incorporates sectoral roadmaps. These roadmaps must be developed to ensure a fair and equitable distribution of costs as Ireland transitions to a low carbon economy.

1.1 *Climate related social vulnerability studies and impact assessments*

No Government study on climate change social vulnerability has yet been carried out in Ireland, although such studies have proven useful in the UK. Such a study must be carried out to provide an understanding of the distributional effects of climate change which can support the development of the national roadmap.

1.2 *Social Inclusion and equality targets in the roadmaps informing mitigation and adaption efforts*

The national and sectoral roadmaps should imbed social inclusion, equality and human rights in the response to climate change. The Bill should include the term 'socially inclusive' in the definition of a roadmap as follows:

'national vision for the transition to a low carbon, climate resilient, [socially inclusive] and environmentally sustainable economy'.

Roadmaps must be in line with the National Action Plan for Social Inclusion, associated national social inclusion and equality measures and international human rights treaty body obligations and commitments.

Climate change mitigation and adaption measures very often bring a cost that falls disproportionately on those most marginalised. Instituting societal behavioural change through taxes and charges has shown some success, most notably with the plastic bag levy. However this incentivising of good behaviour often has a greater negative impact on low-income households because they spend a higher proportion of their income on domestic fuels, live in less energy efficient houses and they are more likely to consume fuels with a higher carbon content such as peat, coal and oil

Initiatives that encourage consumers, in this case of carbon-heavy fuels, to change to low-carbon and environmentally friendly alternatives often overlook the fact that consumer choice is constrained by income, with more sustainable alternatives beyond the reach of low income budgets. Simultaneously, it has been shown that incentivising good behaviour can be undermined by the reality that high income groups and companies can afford to pay charges and have the least incentive to reduce usage

1.3 *An equality budgeting framework in line with current legislation*

The use of an equality budgeting framework to ensure a gender perspective in budgetary decisions began in Australia in the 1980s and has since extended to over 60 countries including the United Kingdom. This was endorsed by the United Nations in the 1995 Beijing Platform for Action which called for the

integration of a gender perspective in budgetary decisions on policies and programmes, as well as the adequate financing of specific programmes for securing equality between women and men. (Beijing Platform for Action, 1995: 345)

Existing Irish legislation provides for gender proofing and equality proofing of bills. This must be used to the fullest extent at both the planning and reporting stages and expanded to include the principles of equality budgeting

1.4 The importance of community development to supporting a socially inclusive transition to a low carbon future

A particular concern of the community sector is that all communities, but particularly those most marginalised and vulnerable to climate change, are supported to participate meaningfully in decision making structures and policy forums. Community development which supports the participation of marginalised and vulnerable groups and communities should be recognised as essential to a socially inclusive transition to a low carbon future. Community development actions should be incorporated into the national and sectoral roadmaps.

2. Emissions Reduction Targets and the Scope of the Bill

2.1 Emissions reduction target of 80% by 2050

Enshrining emissions reduction targets in legislation is particularly important for supporting and equitable and just transition to a low carbon economy. Clear policy measures, such as targets, are proven drivers of large scale societal change. Targets for emissions reductions are a clear statement of intent that can provide the certainty required for public and private forward-planning. This will allow for mitigation measures to be poverty and equality proofed to ensure that the price and responsibility for the transition to the low carbon economy is not distributed unfairly in society. The use of emissions reduction targets is standard practice where climate legislation has been enacted, including in the UK and in the Scottish Parliament.

2.2 Removing carbon credits or offsets as a means of meeting emissions reduction targets.

The use of carbon offsets also highlights a clear social justice issue already outlined in this submission. High income groups and companies can afford to pay for carbon credits or offsets and therefore have the least incentive to reduce usage. Carbon offsets will create a two-tiered transition where those who can afford it may continue to rely on high carbon fuels and unsustainable practices while those who have the least resources and are already contributing least to emissions will be forced to make the greatest changes. This will inhibit the equitable and just transition to a low carbon economy in Ireland.

Additionally, within a global social justice and human rights context, there is clear evidence that the use of carbon offsetting which is provided for by the development of large scale monoculture plantations. This facilitates land grabbing in the Global South which jeopardise the rights to food and water for millions.

2.3 Regulating emissions from the whole economy including those emissions already covered by the EU Emissions Trading Scheme.

One Third of Irish emissions are from power stations and other large scale industrial producers which are covered under the current terms of the EU Emissions Trading Scheme (ETS). However national emissions reductions and our transition to a low carbon economy will not be guaranteed by the ETS, the future of which is uncertain after 2020, and should therefore be included in the Bill so that their successful decarbonisation to 2050 can be ensured.

Given the scale of the sectors covered by the ETS, and particular the electricity sector, these emissions must be included in order to ensure a just and equitable transition to a low carbon economy. These sectors have a huge potential impact on communities facing poverty, inequality and social exclusion. Sectoral decarbonisation in these areas could provide for employment and anti-poverty measures within the context of a green economy. Conversely, without being adequately poverty and equality proofed, measures could entrench inequality and poverty. Communities facing poverty and social exclusion are more at risk from electricity price rises, for example.

3. The Institutional Framework

3.1 Cross-departmental Committee lead by the Taoiseach

The Bill must set out the institutional framework within Government which will support the transition to a low carbon future. The complexity of the climate change issue means that no one Government department will be able to deal with it. Climate Change requires leadership at the very highest level with responsibility for the transition being placed in the Department of the Taoiseach.

3.2 Creating an independent “Climate Change Commission”

The Bill must provide for an independent Climate Change Commission rather than an Expert Advisory Body. The establishment of a commission, with similar status to the Equality and Human Rights Commission, would underpin Ireland’s commitment to taking climate change seriously. This Commission should be independent of Government and Government should be accountable to the Oireactas if it fails to bill on the advice of the Commission.

3.3 Imbedding human rights, equality and social inclusion in the Commission’s remit

The Bill must provide for membership the Commission which includes an interdisciplinary panel of experts and representatives of the marginalised and socially excluded communities who will be most affected by climate change in Ireland.

If climate change mitigation and adaption efforts are to be carried out with a human rights based approach that acknowledges equality and social justice concerns, it would be appropriate to include people with expertise in social policy, social impact assessment, equality and human rights.

It is vital that those communities in Ireland who will be most severely affected by climate change and climate change mitigation efforts are represented and supported to engage in policy formation on climate change issues.

The Bill must ensure that the Commission is required to give due regard to human rights, equality and social inclusion measures in its recommendations for emission reductions.

Recommendations

General

1. The principle of climate justice should be inserted into the Bill, incorporating a commitment to human rights, equality and social inclusion.
2. The Bill must be ambitious and reflect the urgency required to deal with the challenges posed by climate change.

The National and Sectoral Roadmaps

3. The Bill and associated policies must be poverty and equality proofed by
 - Providing for climate related social vulnerability studies;
 - Social Inclusion and equality targets in the roadmaps informing mitigation and adaption efforts;
 - Adopting an equality budgeting framework in line with current legislation;
 - Measurement against human rights instruments including the UN Guiding Principles on Business and Human Rights.
4. The Bill must provide for community participation, with particular regard to marginalised and vulnerable communities under the National Low Carbon Roadmap.

Emissions Reduction Targets and the Scope of the Bill

5. The Bill must include an emissions reduction target of 80% by 2050 in line with science and equity.
6. The Bill must not use carbon credits or offsets as a means of meeting emissions reduction targets.
7. The Bill must regulate emissions from the whole economy including those emissions already covered by the EU Emissions Trading Scheme.
8. The Bill must include interim targets (before 2050) and provide for robust public accountability to the Oireactas in the measurement of progress under such targets.

The Institutional Framework

9. The Bill must set out the institutional framework within Government which should place responsibility for climate change with the Department of the Taoiseach.
10. The Bill must make provision for a Climate Change Commission which is independent of the Government and consists of an interdisciplinary panel of experts.
11. The Bill must make provision for a Climate Change Commission which includes people with expertise in social policy, social impact assessment, equality and human rights.

12. The Bill must ensure that the recommendations for emissions reductions made by a Climate Change Commission give appropriate regard to human rights, equality and social inclusion.
13. The Bill must support the inclusion of representatives of marginalised and vulnerable communities to participate in the development of the roadmaps and the working of the Climate Change Commission.