

Statement to the Joint Oireachtas Committee on Environment and Climate Action
Consideration of Carbon Budgets

13 January 2022

Oisín Coghlan for the Environmental Pillar

Chair, Committee members, the Environmental Pillar is grateful for the opportunity to participate in your Consideration of the Carbon Budgets proposed by the Climate Change Advisory Council and recommended by Government for approval by the Oireachtas.

As you know the Pillar is the advocacy platform of national environmental NGOs in Ireland and a social partner, represented on NESC since 2009.

The first thing to say is that the Environmental Pillar welcomes this landmark moment. Members of our network have campaigned for a climate law to establish a statutory framework for climate policy since 2007, a statutory framework with legally binding targets, independent expert advice and monitoring, 5-year carbon budgets, and strong parliamentary oversight as demonstrated by the work of this committee.

So, we are pleased to be here to see that legislative framework finally kicking in. However, we are now playing catch-up for a lost decade. The latest emissions figures from the EPA have Ireland's national emissions at 57.7mt in 2020, exactly the same as they were in 2011.

2011 was the year we were due to pass a climate law not unlike the one that was finally passed last year. That legislative effort failed largely because of a huge lobbying effort by business and industry lobby groups also represented in these hearings today.

Their proposition at the time was that the EU climate regime was all we needed for Ireland to meet its agreed reduction targets. We now have the results of that real-time, real-life political experiment. And it is a record of failure. The most recent EPA figures show that Ireland overshot its 2020 target by 6.7mt or 18%, and that Ireland was one of only 2 EU member states where emissions were higher in 2020 than they were in 1990. Furthermore, the EPA found that in 2019 Ireland had the second highest per capita emissions in the EU. That rang a bell so I went back and checked. When I started this job, 17 years ago this month, Ireland had ... the second highest per capita emissions in the EU.

I don't say any of this simply to score points, but rather to underscore the following characteristics of the reality we face as this Committee considers its recommendations to Government and the Oireachtas about the Carbon Budget Programme and climate policy more generally:

- We have no time to waste. Or rather **we have no more time waste**. From now on, every time the state faces a decision at national or local government level we have to choose the option that lowers emissions.

- Whenever any stakeholder group pleads for even further delay or dilution of climate action remember this, the longer we leave the transition the more abrupt and the less “just” it will be. If we had passed that strong climate Bill in 2011 then we would have needed to reduce emissions by 3.5% a year to halve emissions by 2030. As you know, because of our lost decade, **we now need to reduce emissions by 7% a year, twice as fast as if we had started a decade ago.**
- We’re a democracy. Interest groups have a fundamental right to freedom of association and freedom of expression. **But vested interests don’t have a right to influence public policy.** Because of the undue influence of carbon intensive industries across the world, and in Ireland, the climate crisis of 15 years ago is now the climate emergency declared by the Dáil in 2019. Now we have to cut emissions in half in 10 years rather than 20. So now, as you have done during the public health emergency of the last 2 years, decision makers need to make climate policy, informed by expert advice, on the basis of the public interest, often under-represented in the media debate, and not based on vocal vested interests who often dominate public debate.

As a public interest organization, the Environmental Pillar welcomes the proposals from the Climate Change Advisory Council on the carbon budgets.

In short, we think that the Committee should accept the proposal from the Council on the size of the first and second carbon budgets (to 2030) and recommend them for adoption to both Houses of the Oireachtas. On the third carbon budget (to 2035) which is a provisional, indicative proposal and will not be adopted as binding by the Oireachtas at this time, we would propose to the Committee that it asks the Council to do further research and study before the Council makes its formal proposal on what the binding carbon budget for 2031-2035 should be (most likely in 2025).

The basis for these two proposals for recommendations by this Committee is our belief that **at the centre of Irish climate policy should be the principle of fairness.**

By fairness we mean:

- Global climate justice.
- Intergenerational justice
- Fairness between sectors
- A fair and just transition, protecting the vulnerable

What that means in practice is the following:

Global climate justice: Ireland should do its fair share of the global effort to achieve the goals of the Paris Agreement, specifically limiting global warming to “well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C”.

Intergenerational justice: this generation of decision makers and power-brokers, people in their 40s, 50s and 60s should make the necessary cuts in pollution now, before it is too late to leave a liveable planet to the generations in their teens, 20s and 30s who will have to live with the consequences of our decisions or inaction long after we have departed.

Fairness between sectors:

- Every sector of society and the economy will have to do its fair share to reduce its pollution. That is not the same as an equal share, some sectors will move faster than others, but every sector will have to reduce its emissions drastically, starting now, and get to zero or close to zero, as fast as possible. As the IPCC puts it: limiting global warming to 1.5°C will “require rapid, far-reaching and unprecedented changes in all aspects of society ... land, energy, industry, buildings, transport, and cities”
- What is different now, under the Climate Act, and with the adoption of this carbon budget programme is that we now have a binding national emissions ceiling for the first time, under Irish law. So now, the size of the overall pollution pie, or emissions cake, is set by this carbon budget programme and what different sectors are now debating is not whether we will meet our overall target, but how big a slice of the carbon budget pie their sector will get. And any sector that argues they should reduce their pollution by less than the average (51% by 2030) is saying that some other sector should reduce by more than 51%, and they should be asked which sector they think that should be.
- It is also worth noting *a crucial characteristic* of the indicative sectoral emissions reductions ranges in the 2021 Climate Action Plan. Only if we achieve the upper ranges of every sectoral reduction target will we meet the overall binding 51% reduction. So they are not really ranges, more progress reports on how far the Department of the Environment has got in extracting adequate commitments from other sectoral Departments. This will be a crucial test for the Government as it prepares the 2022 Climate Action Plan and converts those indicative reduction ranges into specific sectoral emissions ceilings under the law. While this falls outside the official scope of the immediate work of this Committee which is to consider the overall national carbon budget, it is a legal reality it is worth noting now.

A fair and just transition, protecting the vulnerable:

- Workers and communities who are affected by the winding down of intensely polluting economic activity, like those in the Midlands and around Moneypoint, are entitled to the resources and supports they need to continue to have economic opportunity, decent jobs and flourishing communities. And specifically they are entitled to have their representatives, for example the trade unions, engaged in formal, structured, social dialogue about how to achieve a Just Transition.
- Equally, those on low incomes or at risk of poverty must not be further disadvantaged or marginalized by climate action, for example either by increasing

fuel poverty or the skewing of subsidies towards schemes that primarily benefit wealthier sectors of society.

- And industries that will need to significantly adapt their business models or even phase out part of their activities are entitled to have their views heard by decision makers and to whatever supports can be made available to them. What they can no longer do however is delay or dilute policy or action in any way that undermines Ireland's ability to live within our carbon budget.

Based on all of those considerations, it is important to put on the record that, although they are very challenging, our 2030 target of halving emissions and the two carbon budgets that the Climate Council has proposed to 2030 still do not amount to our fair share of the effort required to fulfil the Paris Agreement. Ireland will continue to use more than our fair share of the remaining global carbon budget consistent with the 1.5°C goal for the rest of this decade.

So while the Environmental Pillar accepts the proposal from the Climate Council regarding the two carbon budgets to 2030, they leave us feeling deeply uneasy. Because, as we have been saying for years it is possible for a target to be both “ambitious”, as the jargon goes, that is to say challenging to achieve *and* inadequate based on science and equity.

The analysis by the UN is that in order to have a decent chance of limiting global warming to 1.5C we need to cut *global* emissions more or less in half by 2030 and to near zero by 2050. But that is *globally*, and under any definition of climate justice and according to the principle of Common but Differentiated Responsibilities and Respective Capabilities in the 1992 UN Convention on Climate Change, rich countries like Ireland, the EU as a whole, and the US have to do more, sooner.

So while we accept, however reluctantly, that it is probably impractical, if not impossible, for Ireland to reduce its emissions by more than 50% in 9 years it is important to recognise and acknowledge that we will still be adding to our debt, both carbon debt and moral debt, to those in the Global South who have done least to cause climate change and are being hit first and hardest, and to younger and future generations who have done little or nothing to cause climate change and have little or no power to stop it.

Given that reality we think it is imperative that the Government:

- Step up our contributions to climate finance to help poorer countries adapt to the impacts of climate change that can't be avoided. And our increasing contributions to climate finance must not come at the expense of Irish Aid to build the health, education and social systems they need to develop.
- Become an advocate at EU level for the strongest possible climate change governance and climate action measures.
- Brook no argument from those voices who argue that Ireland shouldn't have to reduce our emissions by 50% by 2030 or that their sector should somehow be exempt. Because cutting our pollution by 50% by 2030 is the least we have

to do, and it is a down-payment not a final payment on our fair share of the effort to achieve the Paris goals.

In particular, we would urge this Committee to request the Climate Change Advisory Council to review what Ireland's fair share of effort under the Paris Agreement is, and to recommend to the Minister that he formally asks them to do that. That is the least we must do to reflect the commitment in the climate law to climate justice. It is not clear to me from the documents published by the Council how they fulfilled their duty under the law to take climate justice into account in preparing their carbon budget programme proposal.

Specifically, the Council's indicative proposal for the third Carbon Budget from 2031 to 2035 does not seem compatible with climate justice. Having proposed a reduction rate of 8% a year from 2026 to 2030 the Council suggests a reduction rate of only 3.5% from 2031 to 2035. It seems to presume a linear reduction path from 2030 to near zero in 2050. As is clear from the UN analysis, richer countries must reach net zero sooner than 2050 given the principles of climate justice and Common but Differentiated Responsibilities. And the climate law is clear that Ireland should reach climate neutrality by 2050 *at the latest*. Given the time constraints the Council was operating under and the imperative to get the proposal on the first two carbon budgets to Government, I wonder how much time, relatively, went in the consideration by the Council of what the principle of climate justice means for our reduction pathway after 2030 and for the final date for Ireland getting to zero emissions.

Given that the third carbon budget is only indicative there is plenty of time for the Council to commission appropriate research on this question and to give adequate consideration to this matter before it gives its formal proposal for the 2031-2035 budget in a few years. However, it would be helpful if this committee in its report explicitly reminded the Government and the Council of its duty to fully consider the principle of climate justice.

In general, it is worth saying one more time that nobody is asking Ireland to do more than its fair share but we are asking Ireland to do its fair share. And nobody is asking any sector of the economy or society to do more than its fair share. But we are asking every sector to do its fair share.

Because only if every sector does its fair share do we have any chance to reduce emissions fast enough to prevent complete climate breakdown and fairly enough to leave no one behind. That is the challenge and the opportunity at hand now.