



Dear Robert

I know that this is arriving to you beyond your deadline, but I thought I had sent it last week. I hope you will take these points regarding the Country Report into account. We will be sharing these points with the Commission too, as part of a submission by the Better Europe Alliance.

The Environmental Pillar must take issue with the constant reference to growth in the process reinforce the fact constant growth in within the one world is not possible. For instance, we are sure the commission is aware of the horrors of cobalt mining in the Democratic Republic of Congo. The same cobalt that we are using for batteries for our mobile phones and electric cars. What will continuing growth in the developed world do for these Congolese cobalt miners?

The Environmental Pillar would like to highlight the lack of interest in Biodiversity Loss within this process.

The United Nations biodiversity chief, Cristiana Paşca Palmer, stated in 2018 that "The world has two years to secure a deal for nature to halt a 'silent killer' as dangerous as climate change"<sup>[1]</sup>. We are losing insects: A report published in February 2019 states "Insect extinction threatens 'catastrophic collapse' of ecosystems. Human activity could see 40% of insect species wiped out in decades."<sup>[2]</sup>

We are also losing large animals - 70% of mega-fauna species with sufficient information are decreasing and 59% are threatened with extinction.<sup>[3]</sup>

### **Climate Change**

Unfortunately, we must repeat that the Environmental Pillar's analysis and recommendations in response to the 2015, 2016 and 2017 Country reports remain relevant, having not been taken on board in Irish policy.

We believe that the young people of the world are the only people that understand the urgency of protecting their future. This may finally be understood by the Government and

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<sup>[1]</sup> Jonathon Ross The Guardian 06/11/2018 <https://www.theguardian.com/environment/2018/nov/03/stop-biodiversity-loss-or-we-could-face-our-own-extinction-warns-un>

<sup>[2]</sup> Worldwide decline of the entomofauna: A review of its drivers  
<https://www.sciencedirect.com/science/article/pii/S0006320718313636>

<sup>[3]</sup> Are we eating the world's megafauna to extinction?  
<https://onlinelibrary.wiley.com/doi/full/10.1111/conl.12627>

Irish policy truly change to meet the realities of Climate Change, Biodiversity Loss and resource over usage.

Ireland must make firm commitments to reduce total emissions outputs from agriculture, transport and energy. These commitments must be underpinned by ambitious and substantive policies which must be implemented fully. These policies will require sufficient resourcing and an all-of-Government approach to ensure that we meet our domestic and international environmental targets.

Reducing emissions requires the implementation policy decisions being made in the interest of a sustainable future rather than short-term sectoral interests. While this implementation may be difficult in the initial stages, it will lead to reduced emissions and benefits for all. This is where our Government and all members of the Oireachtas must show leadership and act in the national interest. Ireland has a window of opportunity to implement ambitious emission reduction policies that will ensure a sustainable future for us all. This requires immediate policy action.

Any programme for sustainable development has implications for public spending. In addressing this issue, it needs to be understood that public expenditure programmes and taxes provide a framework which help to shape market prices, reward certain activities and penalise others. A key aspect of this could be to broaden the tax base through environmental taxation. Eco-taxes, which put a price on the full costs of resource extraction and pollution, would help with the transition towards a resource efficient, low carbon green economy. The taxation system should reflect the environmental costs of goods and services.

A well-designed carbon policy which can reduce the cost of transition will make the necessary reforms more acceptable. It is vital that any carbon tax is well-designed and accompanied by the necessary measures to assist people and communities to transition to a low carbon economy and society. The revenues from carbon taxes should be used to support households in energy poverty to improve energy efficiency and invested in low carbon technologies to improve the energy efficiency of the housing stock. When considering environmental taxation measures to support sustainable development and the environment, and to broaden the tax base, the Government should ensure that such taxes are structured in ways that are equitable and effective and do not place a disproportionate burden on rural communities or lower socio-economic groups.

### **Executive Summary**

The Report still fails to integrate climate change fully into its analysis. It is not highlighted in the Executive Summary, which contains a single reference to climate issues in the context of infrastructure investments. This is despite the fact that Ireland is one of only two EU Member States which is failing to meet its 2020 greenhouse gas emissions (GHG) target for the non-traded sector. This is a headline issue and a major challenge for Ireland which should have been highlighted in the Executive Summary.

### **National Development Plan – NDP**

The National Development Plan is featured in the summary (on Page 4) and in the Progress with Country Specific Recommendations (Page 15) under CSR 2. It is our submission that



the NDP has never been 'Climate proofed'. It is stated that 20% of the monies in the NDP are specifically for Climate related projects, however many of the projects in the other 80% are actually counterproductive, such as building more motorways and the second runway at Dublin Airport. We strongly believe that the bullet point on page 4, "and a sound system for selecting projects remain essential for its timely and effective deliver" should be extended to include "and that said projects should be checked for their actual decarbonisation".

#### **Investments for sustainable development (Page 52)**

This confirms that Greenhouse gas emissions are rising with particularly severe challenges in transport, agriculture, energy and the built environment but gives no suggestions as how investment in sustainable development will alleviate these problems.

There is a reference to concerns from key multinational companies and states that these companies are committed to resource all their energy from renewable sources. As it is stated (page 53) that "Ireland is likely to miss its renewable energy targets", where is this extra requirement for renewable energy to come from?

#### **Ireland is yet to spell out a pathway towards a decarbonised and sustainable future (Page 53)**

We have stated before that National Mitigation Plan is useless in the main because it does not contain any targets. We agree that the Government need to revisit it or replace it.

We do believe the National Planning Framework (NPF) shows the importance of sustainable communities and how they can lead to better community wellbeing and lessening of carbon emissions through reduction in sprawl and car-based commuting. The importance of public transport and provision of cycling and walking infrastructure is fully supported within the National Planning Framework.

However, the National Development Plan (NDP) reverses the NPF's call for considerable investment in Public Transport and walking and cycling infrastructure and proposes more investment in motorways etc. We consider this to be counter to a vision of a sustainable and low-carbon economy.

We are worried that the Government's "whole of government" plan will contain hundreds of policy objective without any 'key performance indicators' and hence will be a tick box exercise.

#### **The draft National Energy and Climate Plan (page 53)**

A summary of the submission on the draft NECP by one of our members:

- Ireland's Draft National Energy and Climate Plan (NECP) fails to deliver energy or agriculture emission reduction, or any coherent climate action aligned with commitment to the Paris Agreement. Therefore, it requires urgent revision by the end of 2019 to ensure that the finalised NECP includes ambitious plans for substantial and sustained reductions in annual GHG emissions.

- The Draft NECP (hereafter “the Draft”) shows no realisation in government that greenhouse gas (GHG) emissions must now go down very fast, no matter what. The climate system does not “care” about economics or population, only about accumulating amounts of long-lived climate pollutants, carbon dioxide and nitrous oxide, and changes in emission rates of shorter-lived GHGs such as methane and black carbon. This is what a mitigation imperative means.
- All four Draft scenarios fail by approximately only ‘flat-lining’ total annual fossil fuel CO<sub>2</sub> emissions from 2015 to 2040, thereby continuing to add about the same amount of CO<sub>2</sub> every year to accumulate further in the atmosphere.
- The Draft is not constrained by any stated quota limit to cumulative CO<sub>2</sub>, to be aligned with a fair share of the global carbon budget for the Paris temperature objectives, therefore it is not a climate action plan that is coherent with the EU’s or Ireland’s own climate plan.
- The Draft even fails to show scenarios coherent with Ireland’s existing climate policy, widely understood as a linear annual reduction in CO<sub>2</sub> to at least an 80% reduction in 2050 compared to 1990
- The Draft’s data projections show no reduction in annual GHG emissions from agriculture and land use to 2035 – methane and nitrous oxide emissions from livestock and nitrogen fertiliser use increase. Therefore, no approach to carbon neutrality in this sector is shown nor any contribution from it to overall decarbonisation as required by the National Policy Position<sup>2</sup>.
- The Draft should assume emission reduction as a driving imperative that must be met by economy-energy modelling within the ‘fair share’ carbon budget limits of the Paris objectives. But instead, contrary to the European Governance Regulation (EU-GR) requirements, Ireland’s Draft NECP assumes that business-as-usual demand growth will be met without decarbonisation.
- The Draft shows a move to lower carbon intensity fossil energy in energy supply – less coal and peat, but much more gas and little change in oil use. Paris requires urgent reductions in aggregate oil and gas CO<sub>2</sub> emissions as well as from coal and peat.
- The NECP proposes some exploratory investigation of the potential for deployment of (still high cost and immature) carbon capture and storage technologies (CCS), but the scale and timing is not quantified in detail, the scope is limited to natural gas and industrial process emissions only (i.e. not oil) and certainly would remain minimal in the period to at least 2030. That being the case, deep emissions reduction are already urgently required within that period that can only be effectively achieved by commensurate absolute reductions in consumption of all fossil fuels beginning immediately.
- The Draft is based on projected increases in emissions from agriculture, which cannot be offset by mitigation in other less prolific emitting sectors. As such the Draft is a plan for increases which breach the linear reduction pathway needed in the 2020-2030 period and exposes the State to substantial and potentially punitive compliance costs. This is not a responsible course of action for government to advocate.
- The Citizens’ Assembly recommendations should have been addressed in the Draft and must be in the final report, the urgency now needed for climate action requires it.



- Stranded asset investments in gas infrastructure such as the proposed Shannon LNG terminal must not be pursued. It is a waste of time and resources to invest in a high carbon fuel that only adds to unsustainable energy and climate insecurity.
- In terms of Climate Action Network Europe's five pillars for transformative NECPs we find that the Draft: fails to deliver sufficient ambition; does not meet a long-term Paris check; has policies that are incoherent and lack consistency even with existing plans; uses technical loopholes (undermining climate mitigation effectiveness) and fails to report all fossil fuel subsidies.
- The Draft was published in a barely readable light blue font with a large 'DRAFT' watermark. This is a basic communications error that needs to be avoided in future. Even a draft plan needs to be in an easily readable black font with no watermark.
- On transparency, DCCAE's NECP consultations have shown a welcome increased commitment to publishing data (as required by the EU-GR). However, the Draft fails to show how views were taken into account, if at all. For example, the basic point that limiting future cumulative CO<sub>2</sub> is core to climate action has been ignored although it is clearly

## **Transport**

In both of the last two years we also criticised the omission of any reference to the then proposed Greater Dublin Area Transport Strategy 2016-2035<sup>[4]</sup>. As mentioned previously, the National Transport Authority which developed the Strategy has confirmed it is based solely on addressing congestion and has not been designed to meet climate change objectives. Consequently, it envisages an increase of about 11% in annual transport GHG emissions from the Greater Dublin Area over the period of the plan.

The Report should have taken note of the Smarter Travel Policy<sup>[5]</sup>, adopted in 2009, which set a 2020 target of reducing greenhouse gas emissions from the transport sector below 2005 levels. This target will not be met. This is due to a failure to implement most of the actions in the Policy. The report has been almost universally ignored.

The implementation of Smarter Travel along with investments consistent with long-term decarbonisation are urgently required. Such an approach also has multiple co-benefits including:

- public health (active travel and reduced air pollution);
- addressing transport poverty, difficulties accessing employment and services, social isolation;
- employment;
- energy security;
- secure long-term return on investment.

## **Fossil fuels and renewable energy**

The Report notes that fossil fuel subsidies remain significant. It does not note that two peat power plants will continue operating beyond 2019. It should also note that it is

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<sup>[4]</sup> <https://www.nationaltransport.ie/planning-policy/greater-dublin-area-transport-strategy-2016-2035/>

<sup>[5]</sup> <http://www.smartertravel.ie/>

intended to indirectly subsidise continued peat combustion at these plants until 2030 by means of a biomass subsidy which requires that at least 70% of the fuel is peat. There is no statement in the plans of what type of biomass will be used or where it will be sourced. There is insufficient locally produced biomass for these plants.

These plants need to be closed down and the current subsidies used to provide the direct and indirect workers and with a 'Just Transition' into other forms of employment.

Then all bogs should be rewetted to return them to Carbon Sinks.

An interesting fact is that for considerable periods in 2018, Moneypoint the country's large coal plant did not run at all, due to maintenance problems. Further, the hydro-electric station at Ardnacrusha did not generate, we believe in order to maintain lake/river levels during the summer drought. The loss of neither seem to have affected the grid.

The development of renewable energy needs to be maintained and increased. Unfortunately, it has slowed in recent years.

There has never been a proper map created showing the areas of the country suitable for renewal energy as constrained by such things as Natura 2000 sites, existing grid, distance to housing etc. Nor has the disparity between the planning system and the grid connection (gate) system has been sorted.

Ireland is apparently still the only Member State which does not provide opportunities for household-level and other renewable energy micro-generation. This continues.

### **Energy Efficiency**

New grant schemes have been announced to increase the number of deep retrofits with a target of completing the approx. 1 million homes by 2050. Why not an earlier target date? One constraint that needs urgent remediation is the serious lack of trained operatives in all aspects of deep retrofitting. A full training programme is required – see possibility for workers from closed peat fired generation. Further promotion is required in the benefits and cash saving possible through Deep Retrofit. Energy companies must provide "pay as you save" schemes

### **Agriculture, Forestry and other land-use**

As with last year's Report, rising agricultural greenhouse emissions are noted but the policies leading to this situation are not discussed. Agricultural policy continues to focus on producing and promoting meat and dairy<sup>[6]</sup>. Its concession to climate policy is to seek to improve the relative carbon efficiency of inherently carbon-intensive foodstuffs.

There is no understanding that these carbon increases are totally negated by the large and continuing increase in cattle numbers in recent years

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<sup>[6]</sup> See agricultural policy as set out in Food Wise 2025 <https://www.agriculture.gov.ie/foodwise2025/>



The Intergovernmental Panel on Climate Change has pointed out that addressing demand can have more impact:

“Hence, the potential to reduce GHG emissions through changes in consumption was found to be substantially higher than that of technical mitigation measures”<sup>[7]</sup>.

It also noted the opportunity to simultaneously derive climate and public health benefits by “shifting consumption away from animal products, especially from ruminant sources, in high-meat-consumption societies toward less climate altering pollutant intensive healthy diets”<sup>[8]</sup>.

Despite this, policy options to shift consumption are ruled out of discussion in Irish policymaking circles.

The absence of a national programme for protecting and enhancing greenhouse gas sinks and reservoirs is striking. We particularly point to the significant opportunity to reduce emissions, protect existing stocks of terrestrial carbon and restart carbon sequestration, with large cost-effective emissions reduction potential, by rewetting, rehabilitating and restoring peatlands and other wetlands<sup>[9]</sup>.

Added to this is the latest information from the EPA<sup>[10]</sup> showing that Ireland exceeded its emission limits for ammonia for the first time in 2016 and this has recurred in 2017 and 2018 and that emissions of this gas are increasing. The agriculture sector accounts for virtually all (99 per cent) ammonia emissions in Ireland arising from the application of fertilisers - 40 million tonnes of animal manures are used annually together with 400,000 tonnes of nitrogen in artificial fertilisers (in 2018)

#### **Proposal for Country Specific Recommendations for Ireland and Ireland’s NRP**

- Ireland must carbon proof the National Development Plan/ National Planning Framework and ensure investment decisions, especially in transport and spatial planning, are consistent with long-term climate emissions pathways.
- Ireland must develop policies to reduce agricultural and land use emissions.

#### **Investment**

See above:

##### **Fossil and renewable energy**

The Report notes that fossil fuel subsidies remain significant. It does not note that two peat power plants will continue operating beyond 2019. It should also note that it is intended to indirectly subsidise continued peat combustion at these plants until 2030 by means of a biomass subsidy which requires that at least 70% of the fuel is

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<sup>[7]</sup> [http://www.ipcc.ch/pdf/assessment-report/ar5/wg3/ipcc\\_wg3\\_ar5\\_chapter11.pdf](http://www.ipcc.ch/pdf/assessment-report/ar5/wg3/ipcc_wg3_ar5_chapter11.pdf)

<sup>[8]</sup> [https://www.ipcc.ch/pdf/assessment-report/ar5/wg2/WGIIAR5-Chap11\\_FINAL.pdf](https://www.ipcc.ch/pdf/assessment-report/ar5/wg2/WGIIAR5-Chap11_FINAL.pdf)

<sup>[9]</sup> [https://www.epa.ie/pubs/reports/research/climate/CCRP\\_15\\_web.pdf](https://www.epa.ie/pubs/reports/research/climate/CCRP_15_web.pdf)

[http://www.ucd.ie/bogland/publications/STRIVE\\_75\\_Renou\\_Bogland\\_prn\\_web%20\(1\).pdf](http://www.ucd.ie/bogland/publications/STRIVE_75_Renou_Bogland_prn_web%20(1).pdf)

<sup>[10]</sup> <http://www.epa.ie/pubs/reports/air/airemissions/irelandsairpollutantemissions2016.html>

peat. There is no statement in the plans of what type of biomass will be used or where it will be sourced.

## **Taxation**

### **Carbon Tax**

It may turn out to be a good thing that the Government did not increase Carbon Tax in the last budget, because they would have done it in a cack-handed fashion, which would have led to a 'Gilets Jaune' situation.

The Joint Oireachtas Committee on Climate Action<sup>[11]</sup> is due to furnish its report by the end of March. One of its principal recommendations will be on Carbon Tax, though the main parties appear to agree on increasing Carbon Tax there is considerable disagreement in smaller left wing parties. Leaked documents suggest that the JOCCA will recommend either a fee and dividend model or one whereby the revenues gathered are ring fenced for Climate Action projects.

Kind regards

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<sup>[11]</sup> <https://www.oireachtas.ie/en/committees/32/climate-action/>