Submission to:

The Joint Oireachtas Committee on Climate Action

Regarding the Third Report and Recommendations of the Citizens’ Assembly entitled “How the State can make Ireland a Leader in Tackling Climate Change

12th Sept 2018
A. Opening Statement by Oisín Coghlan

Good afternoon, we are very grateful for the opportunity to present to the Committee at the start of your deliberations on Ireland’s next steps on climate action. The organisations we represent were keen observers of the Citizens’ Assembly process and wrote to the Business Committee of the Dáil making the case that the recommendations of the Assembly on climate action should be considered with the same seriousness as the Assembly’s recommendations on the 8th amendment. We welcomed the establishment of this Committee and we wish you well in your important, urgent work.

Our civil society delegation contains members of both the Environmental Pillar, the national advocacy coalition of 29 national environmental NGOs recognised by Government as a social partner in 2009, and Stop Climate Chaos, the coalition of 28 overseas aid, youth, faith and environment organisations campaigning since 2007 for Ireland to do its fair share to tackle climate change.

These hearings are very timely: Irish climate policy is at a crucial crossroads.

Our presentation will briefly address the three paths that converge here:

1. The increasing impacts of climate change
2. Ireland’s track record on climate action
3. The all-party consensus that new policies and measures are required

But first, just a couple words about the science of climate change. A few conclusions from the last assessment report by the Intergovernmental Panel on Climate Change, the largest collaborative scientific process in history, suffice to establish the facts on the ground:

A. The warming of the global atmosphere is unequivocal,
   (the average global temperature is about 1 degree Celsius warmer than before the industrial revolution)
B. Climate change is already happening
C. We are as certain that it is caused by human activity as we are that smoking causes cancer.
Back to the paths that lead us to our current crossroads:

1. The increasing impacts of climate change

We are already seeing here in Ireland what climate change looks like. An increase in extreme weather events such intense rainfall events and storms, with direct economic and social impacts such recurring fodder shortages and flooding. The global picture is even more stark, as evidenced in Figure 1 on Extreme Weather Events, from the recent New Climate Economy 2018 report, showing floods, droughts, wildfires and extreme temperature events on the rise.

Figure 1
Global Occurrences of Extreme Weather Events.


These increasing impacts are happening with “only” 1 degree of global warming. Climate Action Tracker, which tracks current pledges and policies globally calculates that current policies would see global warming of between 2.5C and 4.7 C, with over 3C more likely than not. Three degrees of global warming would be catastrophic while a 4C world has been described as “incompatible with an organized global community”.

The Paris Agreement commitment is to keep warming well below 2C and pursue efforts to limit warming to 1.5C. That challenge requires a massive step in action by all parties to the Agreement.
In a major speech in New York on Monday, UN Secretary General, António Guterres, described climate change as a “global emergency” and told the world “it is time to get off the path of suicidal emissions”.

2. Ireland’s track record on climate action

How does Ireland stand in the face of this existential challenge?
To borrow a phrase, I wouldn’t start from here:

1. Ireland has the third highest greenhouse gas emissions per person among the EU28 (2016, source Eurostat)
2. Ireland has the eighth highest greenhouse gas emissions per person among the OECD 35 (2015, World Resources Institute)
3. Ireland is one of only two EU countries that are projected to overshoot their 2013-2020 GHG emissions target (2017, European Environment Agency).
4. The latest projections from Ireland’s EPA is that on current trends, Ireland’s emissions will still be 13% above 1990 levels in 2030 (2018, EPA).
5. In the 2018 Climate Performance Index from Germanwatch ranked Ireland as the worst climate performer in the European Union, 49th out of 57 countries ranked overall.
6. The Climate Action Network Europe report Off Target, published on 18th June 2018, ranks Ireland second worst in Europe for climate action, ahead only of Poland.
### Per capita GHG Gross in tonnes CO2 equiv (ex LULUCF)

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### Overall Results CCPI 2018

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**CCPI Climate Change Performance Index**
Where do EU countries stand on fighting climate change?
3. The all-party consensus that new policies and measures are required

The organizations we represent have been calling for Ireland to do more to cut our climate pollution for a decade or more, indeed two decades or more in some cases. Over that time whatever parties are in Government have tended to defend current policies as the best we can do at that time and the parties in opposition have tended to push for more action.

“New politics”, specifically the fact that the Government does not have a majority in the Oireachtas, has shaken up policy-making significantly, allowing more deliberative, evidence-based policy-making to emerge, with a central role for Oireachtas committees, enabling parliamentary majorities to form to ban fracking and progress Bills to divest the ISIF from fossil fuels, and prohibit new licences for offshore oil and gas exploration.

The big change this year, and it is a positive development, is that the Government has conceded frankly that current policies and measures are not working and that we need a reset. First, back in January, while addressing the European Parliament, Taoiseach Leo Varadkar, conceded Ireland was a climate “laggard” and that he was not proud of our performance on climate change. Second, and more substantively, just two weeks ago Minister Naughten admitted the National Mitigation Plan was not working and would need to be radically revised in the coming months.

The significance of these admissions is that they clear the decks for the work of this committee. Government TDs and Senators no longer need feel honour bound to defend the current plan, and opposition TDs and Senators no longer have any incentive to score points against it. It’s going to back to the drawing board, indeed your work can shape it.

Like the all-party committees on the 8th amendment and on healthcare this committee has an historic opportunity to forge a climate action plan for the next decade that puts Ireland on track to do our fair share to meet the Paris commitment.

4. The path ahead

Irish climate policy really is at a crossroads, one where the increasing impacts of climate change intersect with our poor track record on cutting pollution and the all-party consensus that new policies and measures are required.

In the distance we can see our destination, “a low carbon, climate resilient and environmentally-sustainable economy” and society, according to the 2015 Climate Action Act. Currently defined by Government in the 2014 National Policy Position on Climate Action as an
80% reduction on 1990 emissions in electricity, transport and buildings and carbon neutrality in agriculture and land-use by 2050. The 2015 Energy White Paper goes further setting an 80 to 95% reduction target for the energy system. We can also see the landmarks of our EU targets for 2020 and 2030, but we know we have been heading away from them not towards them. And we know that all those numbers pre-date the Paris Agreement and will need to be revised to be adequate, getting more challenging and more urgent as we update them as part of the EU process to align its climate plans with the ambition of Paris. The National Climate and Energy Plan (NECP), that this Committee is shaping, is the first step in that direction.

What we lack in Ireland is the roadmap of agreed policies and measures to put us on the right path and get us to our destination on time.

But we are not lost. The Citizens’ Assembly has done some inspirational scouting and their thirteen recommendations are the best place to start the dialogue with the Secretaries General of the relevant Departments about the concrete measures to include in the National Energy and Climate Plan (NECP) to ensure that it is aligned with the scale of our Paris commitments. [On the one hand, it is essential that the NECP is subject to appropriate public participation and consultation, and to Strategic Environmental Assessment (SEA). Minister Naughten has said there will be an initial public consultation before the first draft is written and submitted to the European Commission in December. This first consultation should consist of open questions – a “blank page” exercise – asking people what measures they favour to meet Ireland’s obligations. And it should be accompanied by the SEA Scoping Report for consultation too. In 2019, while the Commission is evaluating this first draft of the NECP a public consultation on the draft along with the SEA Environmental Report will have to be carried out. As the Minister has announced that there will be a formal revision of the National Mitigation Plan (NMP) as well, we expect this second consultation to constitute the statutory consultation on the revised NMP too. When the feedback from the public consultation and the European Commission is integrated into the second and final draft NECP / NMP in the second half of 2019. It will need to be accompanied by an SEA statement which is required to provide information on the decision-making process to illustrate how decisions were taken and the reasons for choosing the plan, in light of other reasonable alternatives, therefore making the process more transparent. The SEA Statement must record how the recommendations of both the Environmental Report, the views of the statutory consultees such as the Climate Council, and the submissions to the public consultation influenced the preparation of the final plan.]

On the other hand, the urgency of the particular task this committee has must not be forgotten. This committee is acting on foot of the most innovative and deliberative form of public consultation our Republic has devised. Moreover, since the public consultation that preceded
the 2007 climate action plan (NCSS), there has been at least 10 public consultations on climate policy by my count, and yet the most damning critique of the 2017 climate action plan (the NMP) came from Prof John Fitzgerald, when he said it contained “many bright ideas but no new decisions”.

If you take one thing away from our presentation today it is this. To build on the promise of the Citizens’ Assembly and to maintain credibility in this process your final report will have to recommend decisions: new decisions that reduce emissions. You cannot be more recommending more research, analysis, consideration. As Al Gore has puts it, quoting Winston Churchill from 1936:

“The era of procrastination, of half-measures, of soothing and baffling expedients, of delays is coming to its close. In its place we are entering a period of consequences.”

In the face of the global emergency and Ireland’s baffling procrastination, we see this committee’s role as ushering in an era of action.

We believe the report of the Citizens’ Assembly and indeed the modest proposals in our joint submission to the Assembly by the Environmental Pillar and the Stop Climate Chaos coalition give you all the tools you need.

We look forward to discussing those and other proposals with you in this session today. In their presentations my colleagues will touch on tax measures, transport and planning, agriculture and land-use.

In my remaining time I will highlight a couple of key points on energy, and on the overall policy architecture.

4.1 Energy

a) Put energy efficiency first.

As EU Climate Action Commissioner, Miguel Arias Cañete, put it “Energy we do not use is the cheapest, most sustainable, and most secure energy we have.”

We need to retrofit at least one million homes over the next 10 years. Householders will get healthier homes with cleaner air, lower energy bills and less climate pollution. But it will cost at least €2 billion a year. Most of that will have to come from householders themselves but significant public investment, incentives and project management support will be essential.
Current SEAI grant schemes are too fragmented and are not yet at scale to deliver 100,000 retrofits a year. We will need something of the scale and simplicity of the SSIA scheme in order engage enough people to act and invest: for example, a 1 euro subsidy for every €4 invested by the householder, with more direct state investment required for lower income households.

Equally, householders need the kind of project management support that the Tipperary Energy Agency provides for its deep retrofit clients to give them the reassurance and confidence they need for what amounts to a major home renovation project. Again, SEAI schemes simply don’t do that to the same degree.

And of course, every house we build, every building we build from now on should be zero carbon.

b) Phase out fossil fuels
We just have to stop burning peat for electricity. It gives us just 9% of our electricity but almost a quarter (23%) of the climate pollution from electricity.

Government consultants first advised stopping burning peat for electricity in April 1998. We cannot allow the current direct subsidy for peat stations to be replaced with indirect subsidies for the inefficient burning of biomass, with new contracts between two state-owned companies locking us into peat-burning until 2030.

We need to immediately set up a Just Transition Task Force, with the employers, trade unions, department officials, employment training and support agencies, community representatives and other stakeholders on board, with a deadline to close the peat stations in two years.

The task force and the measures that flow from it can be funded by diverting some of the €100+ million in annual PSO levy that has been subsidizing peat, and by carbon tax revenue as required.

c) Ramp up renewables
We need to get to 100% renewable electricity by 2040. Carbon-free electricity will play a central role in decarbonizing transport and buildings.

The new Renewable Electricity Support Scheme (RESS) has commendable features, such
as a “community pot” for community-led projects and a provision for shared-ownership of developer-led projects with up to 20% being bought by people living locally.

However, the RESS fails to unlock the potential for widespread community engagement that a fair price for solar electricity supplied to the grid would provide. At the moment you get paid nothing for solar electricity you generate but don’t use yourself, you have to give it away for free to ESB Networks.

We want to see every school in the country, and parish and community halls, and sports clubs and farm buildings becoming locally owned power plants.

This would provide significant new revenue streams to local communities, especially in rural areas, and the kind of community engagement and education that will make the transition we are embarking on the a societal project as envisaged in the Energy White Paper.

We believe a payment for solar generation would kick-start this kind of community energy revolution.

4.2 Policy Architecture

Finally, a few words on the policy architecture to ensure action and accountability, as envisaged by Recommendation One of the Citizens’ Assembly to “ensure climate change is at the centre of policy-making in Ireland, as a matter of urgency”.

No doubt when it comes to specific sectors and measures there will be differing perspectives and priorities expressed in these committee hearings. But I hope we can all agree on the urgency of designing and implementing a policy architecture that puts climate change consistently at the centre of policy-making.

The 2015 Climate Action Act was supposed to provide that architecture. Our organizations proposed it and campaigned for it for 8 years.

It has had a positive contribution:

a) the Climate Change Advisory Council provides independent expert advice and monitoring
b) the legal requirement to have a climate action plan means we finally got the National Mitigation Plan in 2017, after a 5 year gap since the previous one; and
c) the annual transition statements by ministers in the Dáil and Seanad are the outline of an annual accountability cycle.

However, the failure of the National Mitigation Plan has demonstrated the law’s weakness. Although it is worth noting that in a closely watched case scheduled for hearing by the High Court next January, Friends of the Irish Environment are challenging whether the NMP is in fact compliant with the Climate Act and EU law. We know, for example, that the Department of the Environment found it very difficult to get other Departments to propose quantified emissions reduction measures.

Comparing the Irish Act to comparable laws in other countries the gaps are clear:

1. The 2050 target should be in the law itself. Analysis of the UK law has indicated that is a cornerstone of its effectiveness.

2. A provision that all new Government policies and plans have to audited for their emissions impact before they are approved. This provision was in the Government Climate Bill published in 2010 but not in the final Bill that was passed into law in 2015. Such a provision would prevent us locking ourselves into a high emissions pathway without even knowing it.

3. Five-year carbon budgets for the whole economy, adopted by parliament, are what drive action across all Departments in the UK law. These five-year emissions envelopes are adopted 12 years in advance, on foot of the advice of the UK Climate Change Committee.

We consistently argued for 5-year carbon budgets for the whole economy to be used in the Irish law, and all the opposition climate Bills included them. Neither the 2010 not 2015 Government Bill provided for them. In fact the Irish Government had a Carbon Budget in 2010 – our Kyoto target for the years 2008-2012 was expressed as total allowable emissions of 315mt CO2. And the 2017 National Climate Change Strategy was the action plan to live within that budget. One of the main reasons the 2017 National Mitigation Plan hasn’t worked is because it didn’t start with a whole-economy carbon budget to which the policies and measures had to add up. It started with no limit, no target and simply invited sectoral Departments to propose measures to cut pollution. Setting a carbon budget, just like setting a fiscal budget, sets up a dynamic of negotiation within Government and between departments about how divide up the “emissions space” between competing priorities. Without that budget, that limit, Government negotiations on climate measures will never produce a plan to cut emissions in line with the Paris Agreement.

Interestingly, the Climate Change Advisory Council’ latest report gives an outline of what Ireland’s carbon budget between now and 2050 (at least for CO2).
Leaving Cert maths enables you calculate the area under the curve for each 5-year period from 2020 to 2050 to give you the Carbon Budgets envisaged by the Climate Council’s indicative emissions reduction pathway to 2050 in that graph. It would be very helpful if the Council began to calculate and express Ireland’s obligations in those terms.

Such calculations are common place for the global carbon budget compatible with the 2C upper limit of the Paris Agreement.
Our organizations have done that math based on Ireland have a fair share of the remaining global carbon budget:

What this exercise shows that if we start taking real action now we need to reduce our non-agricultural emissions by 5% a year, every year from now to 2050, to get on a Paris-aligned pathway.

That is the task this Committee has: to identify policies and measures that will reduce Irish emissions by 5% in 2020, by 5% again in 2021, and again in 2022, and again every year until 2050. That is the scale of the urgency we need to our share in ensuring the global emergency doesn’t become a climate crash.

I will now hand you over to my colleague Charles Stanley Smith and Andrew St Ledger, to begin exploring what some of those policy decisions should be. The proposals briefly outlined here are built around the individual recommendations of the Citizens Assembly.
B. Opening Statement by Charles Stanley Smith

Recommendation 4. Vulnerability Assessment:

We agree this is very necessary requirement and there needs to be serious public participation in the design of the process undertaken. The assessment should be at the level of individual structures, such as individual dams or rail-lines. We also agree that this assessment must be prioritised and begin immediately.

Recommendation 7. Ending Subsidies for Peat:

Further to this, there is no available sustainable biomass that can be imported to be burnt either in the current peat stations or in Moneypoint.

We do need more interconnectors to Europe. Modern forecasting methods are leading to better control of wind and solar generation. This means that the need for ‘base load’ generation is actually reducing.

We also believe that the extraction and export of millions of tonnes of horticultural and other peat products must be counted in Ireland’s overall emissions.

Further bogs should be rewetted and the arterial drainage scheme, started in 1948, should be reviewed as draining high carbon soil is the cause of a significant percentage of agricultural emissions, whilst depleting soil fertility.

Recommendation 8. Bus Lanes, Cycle Lanes and Park and Ride:

The National Planning Framework understands the requirement for walkable communities and encourages increased investment in the provision of Public Transport and cycling and walking infrastructure as a means of preventing sprawl. Long commutes are a social problem as well as a cause of added transport-induced GHG’s. However, the National Development Plan shows a far larger investment in Motorways and the Second Runway at Dublin Airport. The Government make great claims that 1/5 of the NDP is specifically for Climate Action, which is very positive, unfortunately much of the other 4/5 is counter-productive.
Rather than the 5% of the Transport Budget in the National Development Plan, we suggest that a 2/3 share of the transport budget for walking and cycling would be needed to drive the necessary behavioural change.

**Recommendation 9: Transition to electric vehicles:**

The first priority should be to move away from car ownership towards public transport, shared electric car schemes and car-pooling. People should look at the real costs of running a car and consider using the above.

These transitions should not simply be fiscal encouragements, but also fiscal discouragements for the continuation of petrol/diesel engine cars. The strictures of other European Governments may force European car companies to end the manufacturing of fossil fuel powered cars before any date is set by the Government. However, a date for banning these should be set for the urban areas in line with that set for other European cities e.g. Norway is proposing to ban petrol/diesel cars by 2025. Swedish cities will ban diesel cars not meeting Euro 6 standards and petrol cars not meeting Euro 5 emission standards by 2022 in several city centres.

**Recommendation 10. Clean Public Transport:**

Conversion of Public Transport to electric power just makes sense, and it will provide inbuilt air quality improvements. At this moment sprawl and one-off housing makes the provision of Rural Public Transport extremely difficult. Rural Transport is a social requirement and a move to living in sustainable communities will make it easier to provide.

**Recommendation 11. Tax on GHG’s from Agriculture:**

The Taoiseach has stated that we have to raise the current, carbon tax but there would have to be compensatory measures. The Climate Change Advisory Council recommends that the carbon tax be raised to €30 per tonne in Budget 2019 as an essential component of achieving decarbonisation, rising to €80 per tonne by 2030.

We concur with the need to raise the Carbon Tax but feel that it needs to start at €70 in 2019 and raise by €5 a year thereafter to be effective. Half of if should be given straight back in a "carbon dividend" or share, to every adult. The other half should go into a Just Transition Fund or Climate Action Fund to fund the transition and provide funds for retrofitting and other energy saving measures.
On the grounds of equity, and in line with the polluter pays principle, a carbon tax on agricultural emissions should have be similar.

A new report by Teagasc\(^1\), the national agriculture research agency, states a carbon price on Irish agricultural emissions of €50 per tonne (CO\(_2\)e) is required to enable climate mitigation efforts in the sector, they state “The optimal carbon price, at which most mitigation could be achieved was assessed to be €50 per tonne CO\(_2\)e”.

Teagasc have stated ‘By far the largest driver of agricultural GHG’s is cattle numbers’.

A tax on ammonia emissions should also be encouraged to accelerate the move away from splash plate slurry spreading. Irish ammonia emissions are in breach of our EU obligations and 99% of these emanate from agriculture.

We further need to ensure that CAP is reformed to move from intensive ruminant-based farming to high nature value farming that provides more environmental protection, enhances biodiversity and ensures more long-term security for the farming community.

We also need to be careful about forestry if it is intended to burn it at a later date. It takes decades for forestry to become a carbon sink and burning it in the 2030’s will be at a time of Climate Change Stress and at a time we should be nearly decarbonised.

**Recommendation 12. Food Waste:**

While some efforts are being made at the retail and consumer end of the food supply chain\(^2\), reporting of food waste at every stage would encourage initiatives to address food waste at the start of the food supply chain including farms. Vegetable growers have significant levels of food waste due to strict cosmetic specifications enforced by retailers. This is particularly pertinent given the impact of the recent drought on the sector.

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\(^2\) (See [https://foodwastecharter.ie/the-charter/](https://foodwastecharter.ie/the-charter/))
C. Opening Statement by Andrew St Ledger

Recommendation 2. Calls for resilience of Public lands:

Coillte, who are in charge of the largest public land bank consisting of 7% of the land mass, are not managing this land to ensure Climate resilience and are not delivering a public good. The McCarthy report assessing state assets for privatisation in 2010 found approximately half of the Coillte public forest estate, 500,000 acres, was not commercially viable, and at 0.4% annual return from its forest business was not economically acceptable. The Environmental Pillar wishes to see an Independent review of Coillte and the 1988 Forestry Act which created Coillte. This latter needs to be reformed to ensure that long standing forests focussed on native trees are created for the longer term benefits including climate mitigation. We want to see this, the largest public land bank transitioning to mixed native woodlands and forests that ensure sustainable management of this natural resource for climate mitigation and adaptation.

Recommendation 13. Land diversification with focus on planting forests and encouraging organic farming:

The Environmental Pillar has serious concerns regarding the viability and validity of the current State forestry policy, especially in relation to the Climate change mitigation claims and other co-benefits made for this industry, in the areas of, carbon sequestration, biodiversity value, flood mitigation, soil and water protection. The State has spent approximately 2.5 billion euros on a forestry programme in the last ten years. We need to ensure this use of Public Money is delivering a Public Good especially in relation to Climate Change mitigation.

The sustainability of the current model is predicated on increased annual harvests of 35 to 50 year old trees, coupled with at least 15,000 ha of new planting, this is the Sustained Yield. However, the science of sequestration for 35-50 year tree cycles is highly questionable and the risk of overestimating sequestration rates means that a robust scientific methodology must underpin any strategy to use forest offsets for emissions.

In reality, Ireland has averaged only 6000 ha new planting and the age profile of harvesting is going down which leading inevitably to deforestation. It is predicted that this year only 4000 ha

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5 http://www.rte.ie/player/show/10913198
will be planted. The reality is we are actually headed for a deforestation scenario, with only 0.2% increase in forest cover between 2012 and 2018, from 10.5% to 10.7%, when this poor planting is combined with ongoing higher harvesting rates. In this situation forestry will not only be failing to mitigate against climate change it may be making it worse.

This forestry model also ranks as the second greatest threat to designated habitats and species in Ireland after Agriculture. Almost 40% of designated habitats and 20% of species designated under the Habitats Directive have forestry as a pressure or threat. At a species level over 20% of species designated under this Directive have forestry as a threat.

There is an urgent need to change the direction of forest policy in line with the 2013 Forest Policy Review main Recommendation, to separate commercial timber production from Environmental and Social objectives, to ensure our Forest Policy can deliver Climate Change mitigation and resilience. The Environmental Pillar believes this can be achieved by the creation of a Forestry Task Force as a component of the independent body to ensure Climate Change to be at the centre of policy making in Ireland, in line with Recommendation No 1 of the Citizens Assembly.

Globally we need a new forestry model focused on our native trees and woodlands, which are the richest land based habitat for biodiversity, and are still the life support system for so many Indigenous peoples, and for us all. These future forests must be created for longer term multiple environmental and social objectives, allowing the trees to grow old to absorb more Carbon and to bank it long term and develop complex ecosystem services, which are invaluable, and essential for our future survival in these times of extreme Climate change. Native trees are more adaptable and resistant to new diseases and threats, such as the pine weevil causing devastation in the non-native pine plantations, and needing toxic chemical fixes.

**Recommendations 11 and 13.** Reward farmers for Carbon storage and land diversification with the focus on planting forests and encouraging organic farming:

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6 A Forest Service official during a discussion on afforestation issues said it was looking like this year only 4000 ha would be planted, this was on 23rd May 2018 at the Forest Programme Implementation Group meeting


The Pillar want to see options and rewards for diverse Agroforestry systems with more supports for Organic farming. Native trees on farms can also alleviate flooding by reducing and slowing the flow of water from land to river channels and reduce soil quality depletion. Riparian planting would be especially valuable for this purpose and can benefit the connectivity of habitats in the landscape by providing biodiversity corridors for the movement of species of plants and animals.

Contact:
Michael Ewing
Coordinator
Environmental Pillar
Knockvicar, Boyle
Co Roscommon
Tel: +353 71 9667373
Mob: +353 86 8672153
email: michael@environmentalpillar.ie

This submission was developed using the Environmental Pillar processes but is not necessarily the policy of each member organisation in the pillar.

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9 According to a World Agroforestry Centre/UNEP (United Nations Environmental Programme) report from circa, 2009, the agricultural sector could be largely carbon neutral by 2030 and produce enough food for a population estimated to grow to nine billion by 2050, if proven methods aimed at reducing emissions from agriculture were adopted. Key among these methods are, agroforestry, reduced cultivation of the soil, and the use of natural nutrients such as provided by fertiliser trees.

Re :Forest