



**Joint Oireachtas Committee on Environment and Climate Action**  
**13 January 2022**

### **Environmental Pillar Opening Statement**

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 organisation, 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.

I would also like to focus on the forestry sector in relation to its contribution under sectoral targets.

Ireland and the EU have declared a Climate and Biodiversity Emergency, and it is now widely accepted that sustainably managed forests can contribute significantly to climate mitigation, with biodiversity restoration and conservation benefits. The Irish Government is planning to substantially increase forest cover with a new target to plant 8,500 ha per annum over the coming years. The positive or negative impact that this new forestry in Ireland will have on climate mitigation and biodiversity will ultimately depend on a range of factors, such as where afforestation/new planting takes place, the management model of forestry used and the environmental safeguards that are implemented.

### **Forestry Sector Issues and Obstacles:**

Firstly, to summarise the issues and obstacles, given the perfect storm of events that are now afflicting the forestry sector: a licensing logjam; public opposition to the tree farming model; farmers reluctant to plant for many reasons, the main land opportunity for farms to increase our low forest cover; afforestation levels which are now the lowest since the 1930's, Brexit and over reliance on the UK markets, with 85% of wood products exported to the UK.

We also see the absence of a serious hardwood component, despite the conditions here among the best in the world for hardwood growth, the absence of a woodland culture and associated strong wood crafts and furniture making sector. This is combined with the lack of traditional woodland skills and knowledge for alternative forest management methodology and forest uses. The lack of these drivers is therefore also unable to contribute towards a move in this direction.

The overall failure to grow higher quality timber of diverse species to service a wider market, instead focusing on a race to the bottom model of fast-growing monocultures, is threatened by the global glut of cheap timber from the same type of tree farming

model driving global timber prices down. Lower volumes of higher quality and more diversity will ensure a more secure profitable future.

By way of example, the ESB is a regular large-scale purchaser of timber products, who at one point imported €45 million worth of timber poles in one year during the Celtic Tiger years to service new developments, and who are still importing thousands of line poles for an average of €600 to €800 per pole and transmission poles at €2000 each. It is remarkable that both the industry and the Forest Service failed to see this gap and aim to fill some of it. The Irish Timber Frame Association, who are involved with 35% of house builds, have admitted that they mainly import graded quality softwood from Scandinavia. Further, we are importing kiln dried hardwood as firewood for sale in the supermarkets and builders suppliers.

### **Coillte, the Irish Forestry Board, Not fit for Purpose:**

We have a state forestry company managing the largest public forestry area which is not fit for purpose, according to the All-party Oireachtas Climate Committee's final report published in 2019. The creation of Collte Nature does not go far enough for the root and branch reform needed in our opinion and looks like window dressing. Coillte are in a privileged position and should be leading the forestry sector in terms of Sustainable Forest Management and innovation in the sector.

### **An Industrial Forestry Model Not fit for Purpose:**

A serious ecological and biodiversity deficit exists in the forestry model, as evidenced by the struggle to ensure new forestry licenses can live with improved environment standards, huge clear-fells and avoidance of Environmental Impact Assessment processes by staying just under the 50 ha threshold. We also have over harvesting of younger trees and not enough older trees managed for long term multiple benefits combined with lower planting rates, leaving us headed for deforestation with large forest carbon deficits.

The industrial tree farming model is concentrated in a number of under populated counties, including Clare, Mayo, Cavan, and Leitrim, with 30% among the highest area concentration of these green deserts, with major negative consequences. Much of this new planting of extractive forestry is being incentivised by tax free grants availed of by private investors, while the legacy state blanket coniferisation policy on upland peat soils is maintained by Coillte, with at least 6% under a clear cut and replant regime and is made up of 90 to 95% non-native Sitka spruce. Much of this Coillte industrial plantation area is on steep slopes, using vertical drains, which cause flooding in the lowlands, especially after large clearfells. These vertical drains are also assisting carbon leakage from soils and currently there is no regulatory authority responsible for them. They are operating in a regulatory limbo.

Under existing EU Sustainable Forest Management (SFM) treaties, e.g. Helsinki, Lisbon, etc, all Member States were required to amalgamate all existing forestry legislation into one Act which reflects the objectives of those SFM treaties. The 1988 Forestry Act, which created Coillte, Act predates the 1992 Rio Declaration on the Environment, from where the SFM Principles originate, giving equal prominence to environmental, economic and social considerations.

This is impacting on more than half of the total of 11% forest cover and is unacceptable as well being totally out of line with existing EU Sustainable Forest Management treaties.

### **Urgent Need for an Independent Accurate Satellite Survey of Timber and Carbon Stocks with Full Cost Benefit Analysis:**

We urgently need an honest, accurate, independent appraisal and critique of the current situation before we start drafting any new policy, strategy or programme and to align with our climate action plans.

As part of this independent analysis, we need to know the precise status, health and condition of the broadleaves and the Native Woodland Scheme elements, and we need to see a critique of these two schemes. The same is needed for plantations, including those abandoned and failed, so that we know what is working and not working. A full cost benefit analysis that includes the environmental impact costs, known as the triple bottom line would also help this process, as to date analyses have been solely focused on social and economic impacts.

A complete and fully detailed breakdown of wood products and timber, softwoods and hardwoods imported from the Central Statistics Office would be useful in order to plan for wood import substitution, which has been lost sight of and was one of the main objectives for developing a forestry sector back in the 1930's.

Precise, up-to-date Information and data, including the use of independent satellite mapping to cross check with the National Forestry Inventory, are needed to make informed decisions. We do not have this data and are instead relying on assumptions and inaccurate projections of carbon and timber stocks.

### **Forest Carbon Storage:**

Regarding carbon storage from Ireland's forests, we are told by the industry and by the Forest Service that the sector accounts for 3.8mt each year, while according to Teagasc, the national farm research body, projections via their marginal abatement curve scenario for agriculture emissions reductions predict only 2.1m tons of carbon between 2021 and 2030, based on their calculations of low afforestation and higher harvesting.

We need a National Land Use Strategy which integrates farming and forestry to assist the agriculture sector in meeting our climate and biodiversity targets.

Coford, the state forestry research body, in 2007, warned the industry that a minimum afforestation level of 10,000 ha per annum would be needed to stand still and balance our annual harvesting rates and that ideally 15,000 to 20,000 ha was necessary to ensure that our forest area would increase, as well as deliver on carbon storage, timber production and biodiversity commitments at EU and UN level.

The fossil fuel use and full carbon accounting of our current forestry model, which is dependent upon thousands of truck journeys as well as heavy harvesting machines, is also completely out of step with EU Forestry Strategy. The rate of harvesting is increasing and the age profile of the plantations is reducing, combined with historically low afforestation rates, and as a result we are looking at a deforestation scenario in Ireland with exaggerated carbon sequestration projections that cannot be supported.

Further, Coillte are converting forested areas for wind farms, which have caused massive carbon and biodiversity losses, via large scale landslides, e.g., Derrybrien, in breach of the EIA Directive.

#### **Time for a New Forestry Model and Vision:**

The priority must be an expansive, imaginative ecologically focused forestry vision, which genuinely balances the three legs of the Sustainable Forest Stool: the Social, Environmental and Economic. It must protect and enhance existing valuable habitats and water quality, while increasing long term carbon storage via permanent forests with increased use and creation of longer-lived wood products. It must also involve supports for a new alternative Woodland Management Training element, together with research and development, moving from our production-focussed system to one which benefits communities, the environment and the economy.