

Getting Ireland's climate action "back on track": What *exactly* does it mean?

A submission to the Joint Oireachtas Committee on Climate Action (JOCCA)

An Taisce Climate Committee
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Context

There is now widespread recognition that Ireland's response to the challenge of climate change has become badly "off track" and that decisive action, across the full spectrum of societal needs and activities, is needed to address this. The threat of climate disruption is now so clear and present, that it is no longer enough to "do what we can": we must be willing to do *what is necessary*. In that light, the Joint Committee has rightly investigated a wide range of policy areas and identified many important potential interventions to be considered. However, to be properly effective, these measures must collectively "add up". They must be commensurate with the scale of the challenge.

But what exactly does that mean? What are the key, summary, metrics or indicators of effective climate action? What *is* the "track" we should be on, and how quickly can we return to it?

We suggest that, without clear and unambiguous answers to these questions, it will be impossible to properly design any "whole of government" plan for climate action, or to monitor and demonstrate its ongoing effectiveness. It is, after all, easy to take "action". It is much more difficult to show that these actions measure up to what is required. But the citizens of Ireland are now surely entitled to no less than complete honesty and clarity on this central question, no matter how daunting the scale of the challenge that might be thus revealed.

Accordingly, we suggest that the Joint Committee can and should include in its final report, a clear and specific statement as to how the *overall* "track" of Irish climate policy should be defined and monitored: that is, what it means to get climate action "back on track" and how we will know that that is happening, particularly over the next critical five years. While this must be aligned with international commitments, we propose that it can and should be founded on our own, voluntary, nationally determined, targets and commitments. To support the Joint Committee in this work (and of course without prejudice to its conclusions) we offer below one particular possible formulation of such a statement. The detailed rationale and methodology for this formulation is included as a separate appendix.

(Re-)Setting the “Track” of Irish Climate Action

Based on the sovereign, voluntary, national climate change mitigation objectives already adopted in the [Government National Policy Position on Climate Action and Low-Carbon Development of 2014 \(NPP\)](#), and noting that the Climate Change Advisory Council has found that current policies are badly “off track” to achieving these already agreed objectives, we propose the following three specific over-arching commitments, to be delivered over the five year period 2019-2023 inclusive, as an *absolute minimum threshold* for getting Irish Climate Action progressively “back on track” within that period:

1. For the emissions category of **electricity generation, built environment and transport** (taken here to also include industrial process and manufacturing emissions, and consisting substantially of CO₂ only, per the National Policy Position), to achieve a progressive reduction in annual emissions (linear pathway) of **at least 28% by 2023, relative to the level in 2018** (projected at c. 41MtCO₂). This will require successive year-on-year reductions of c. 6-7% each year. Pathway over-performance or under-performance in any single year to be carried forward so that the same overall *cumulative* reduction target is met for the period as a whole (corresponding to a fixed 5-year “carbon budget” for this category of no more than 169 MtCO₂).
2. For the emissions category of **agriculture and land-use, including forestry**, to achieve a progressive reduction (linear pathway) in annual (nett) emissions of **at least 24% by 2023, relative to the level in 2018** (projected at c. 23 MtCO₂e). This will require successive year-on-year reductions of c. 5-6% each year. Pathway over-performance or under-performance in any single year to be carried forward so that the same overall *cumulative* target is met for the period as a whole (corresponding to a fixed 5-year “carbon budget” for this category of no more than 100 MtCO₂e).
3. In accordance with an action already identified in the first [National Mitigation Plan \(2017\)](#), to commission an urgent independent expert review of the *adequacy* of the national mitigation objectives currently stated in the National Policy Position, with particular regard to the [Paris Agreement](#) (2015), including its commitment to global equity, the [IPCC Special Report on Global Warming of 1.5°C](#) (2018), and the forthcoming [IPCC Special Report on Climate Change and Land](#) (2019). This review process should include comprehensive public participation, informed by the model of the Citizens’ Assembly. The review should be completed and a fully revised National Policy Position presented to the Oireachtas **no later than June 2020**.

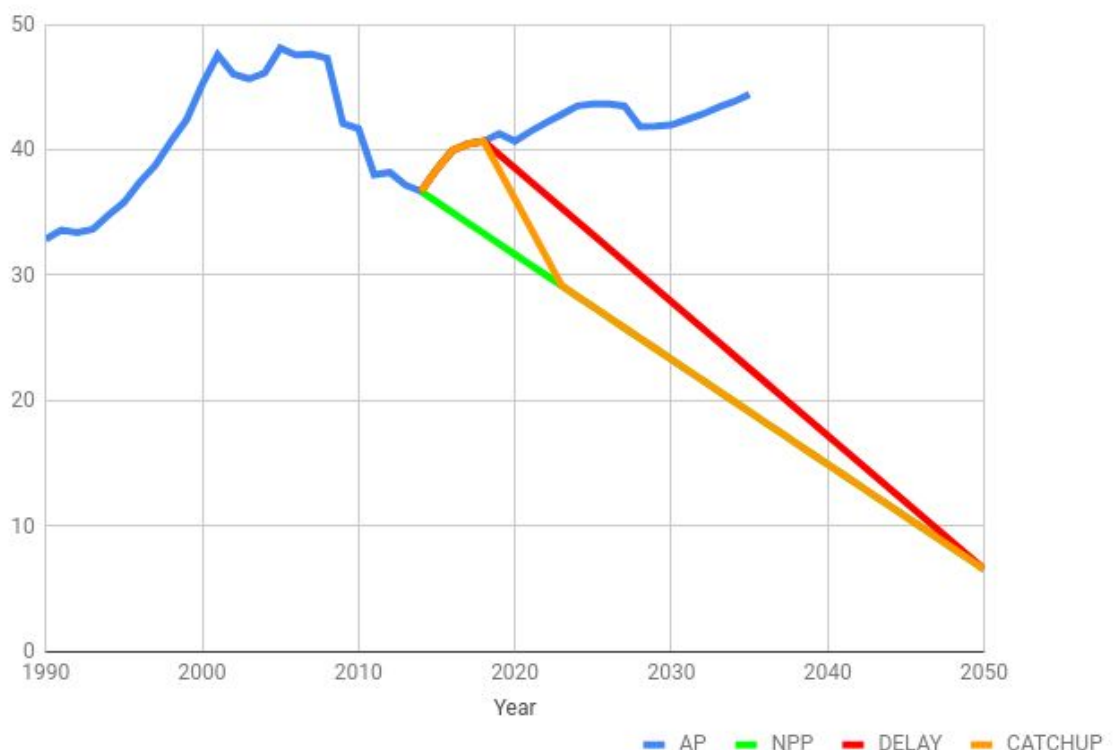
Appendix: Rationale and Methodology

The basis for the proposed climate action “track”, presented above for the two emissions categories of the National Policy Position (NPP), is as follows:

- Conform to the NPP “point-in-time” (2050) target levels. For electricity generation, built environment and transport (EGBET) this is a reduction of 80% compared to 1990 levels. For agriculture and land-use, including forestry (ALUF) this is stated as “an approach to [nett] carbon neutrality”. For the purposes of practical analysis, we adopt a default interpretation that such a process of “approaching neutrality” can only reasonably mean *arriving* at (nett) zero ALUF emissions by 2050.
- While the NPP itself states no specific progressive reduction *pathways*, both the EPA and the CCAC have interpreted the NPP by showing “illustrative linear pathways”. Likewise, EU national climate action (ESD to 2020, CAR to 2030) is targeted on the basis of linear pathways and related cumulative emissions over fixed periods of policy action. Accordingly we take a baseline interpretation of the NPP (for each of the two separate emission categories) as implying linear reduction pathways, starting from 2015 (the year following the adoption of the NPP) and extending to the relevant 2050 target emissions level.
- In both categories, actual emissions since 2015 have tracked significantly above these NPP “illustrative pathways”. **We interpret this as the key indicator of Irish climate action being currently “off track”.**
- One possible way of interpreting getting back “on track” (from 2019) would then be to plot new linear pathways just starting wherever the emissions happen to turn out to be in 2018. However, certainly for long lived gases (CO₂ and N₂O) this is *not* scientifically well grounded: as the climate impact is essentially determined not by annual emissions directly, but the accumulation of these emissions over time (the “area under” the pathway). Therefore, such “newly initiated” pathways, tracking consistently above the “original” NPP pathways (which should have commenced from 2015) would represent significantly more cumulative emissions (and thus warming) than properly allowed for in the NPP.
- This is a complex technical issue to fully take account of. We therefore believe it would be best considered in the context of a **full review of the adequacy of the NPP**: that is, point 3 of the commitments presented above. But as a basis for effective policy action in the interim, we suggest that a *minimal* interpretation of “getting back on track” would be to *get back down onto the original NPP linear pathways* within, say, five years. While this would still involve greater cumulative emissions than the original NPP pathways, it would be much less than just tracking above the NPP all the way to 2050.

- The two charts below summarise all these considerations. **AP** denotes “actual and/or projected” emissions. **NPP** denotes the “illustrative linear pathways” corresponding to the “original” NPP (reduction starting in 2015). **DELAY** corresponds to hypothetical new illustrative linear pathways starting from the projected 2018 emissions and just tracking to the original NPP 2050 point-in-time targets (with clearly excessive extra cumulative emissions as a result). **CATCHUP** corresponds to an immediate five year “illustrative linear pathway” that brings annual emissions back to the maximum level they would have been on the original **NPP** pathway, by 2023 at the latest.
- The proposed commitments presented in points 1 and 2 above are therefore based on the **CATCHUP** pathways, as our (An Taisce’s) *minimal interpretation* of getting Irish climate change mitigation action “back on track”.
- An Taisce is happy to share the full spreadsheet detailing these calculations, and the generation of these charts, on request.
- An Taisce gratefully acknowledges technical advice and data analysis in support of this note provided by Prof. Barry McMullin and Mr. Paul Price of Dublin City University.

EGBET Pathway Chart



ALUF Pathway Chart

