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Sent by email to: carbonbudgetsconsultation@decc.gov.ie

3rd June 2025

Re: Consultation on Carbon Budgets (CBs)

A Chara,

An Taisce would like to make the following observations on the above consultation.

The Climate Change Advisory Council's (CCAC's) December 2024 carbon budgeting proposal assessment basis for the 2031-2040 recommendations is non-compliant with the requirements of the Climate Act 2021 in two key aspects:

- The CCAC failed to assess their recommendation in any defined equity terms. Therefore, contrary to the legally binding provisions of the Climate Action and Low Carbon Development Act 2021 (as amended), their recommendation failed to be "consistent with" Paris Agreement Article 2, specifically 2(2) requiring climate action implementation on the basis of Common but Differentiated Responsibilities and Respective Capabilities (CBDR-RC).

- The CCAC provided no comparison of their "climate neutrality by 2050" test of its scenarios with the 1.5ºC "Paris Test" used in their 2021 Carbon Budget Technical Report recommendations. The CCAC ethicist's report found that the 2021 CB basis was at best only a minimal contribution to climate action by Ireland in global equity terms (meaning it was very generous to Ireland), yet no such Paris Test reassessment was made on the new recommendation.

Climate Justice

The CCAC ethicist's report highlighted that the previous 2021 Carbon Budget basis was conservative, at best:

"This leads to my first conclusion: the assumptions made in the CCAC Paris Test are (mostly) philosophically plausible, but are conservative in the sense that they are amongst the most favourable to Ireland…carbon budgets based on these assumptions should be viewed, from a philosophical point of view, as upper bounds." (p. 12)

"My second conclusion is that, if one accepts any of a range of alternative equity principles, such as appeals to capacity or historical responsibility, one would demand more ambitious mitigation or limited carbon budgets." (p. 12)

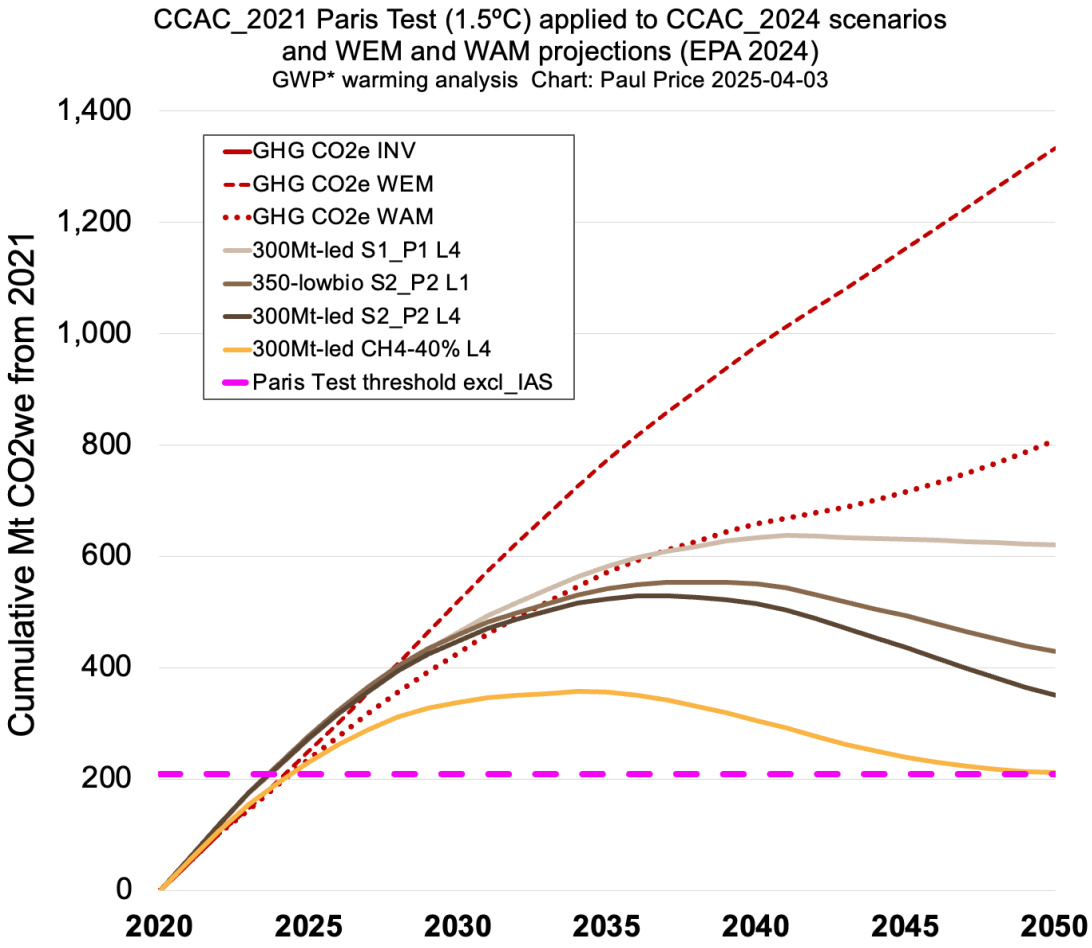
This is echoed by the CCAC in Section 3.8 'Climate Justice' of the Carbon Budget Proposal report (p. 9), which highlights that were a more fair or equitable approach taken in setting carbon budgets, a more stringent approach would ensue and Ireland would decrease its carbon budgets:

"The Council has taken the approach of assessing Ireland's projected future warming impact and constraining carbon budgets based on climate neutrality by ruling out scenarios incompatible with climate neutrality…This is a deliberately minimalist interpretation…alternative approaches would lead to more stringent carbon budgets."

Climate Neutrality by 2050

On the issue of Climate Neutrality by 2050, the chart below is an analysis of With Existing Measures (WEM)/With Additional Measures (WAM) and CCAC scenarios relative to the CCAC 2021 Paris Test threshold, not including international aviation and shipping (IAS), as corrected by McMullin, Price & Ó Dochartaigh (2024) to 210 MtCO2we, based on GWP* warming analysis as used by the CCAC in 2021.

In the chart below, one of the researchers has added a scenario where they adjust the CCAC new proposal's 300Mt-led scenario by cutting agricultural methane by 40% by 2030 and -0.3%/yr thereafter, so that the outcome returns to the 2021 Paris Test threshold level by 2050. It can be concluded that the Paris Test threshold already used by the CCAC can be achieved by taking the necessary measures, however radical they may seem. Postponing such actions merely transfers the problem to the next round of carbon budgets and further delays meeting the level of climate action required to achieve the level of fair-share climate action previously defined by the CCAC.



Legend Abbreviation Explanation (using EPA data and scenarios as outlined in Box TA2 of the CCAC Carbon Budget Proposal Report 2024, p. 22):

Paris Test threshold excl_IAS: 210 MtCO2we, the corrected CCAC 2021 Paris Test threshold for Ireland, as per Point C in McMullin et al. 2024, including national CO_2, CH_4 and N_2O emissions but excluding International Aviation and Shipping (IAS).

GHG CO2e INV: Historic data for 2021 and 2022 from the EPA National Inventory Report 2024 (1990-2022).

GHG CO2e WEM: projected greenhouse gas emissions of carbon dioxide equivalent under the current With Existing Measures scenario.

GHG CO2e WAM: projected greenhouse gas emissions of carbon dioxide equivalent under planned With Additional Measures scenario.

300Mt-led S1_P1 L4: 300Mt carbon budget scenario with assumptions of low energy demand, baseline medium agricultural activity scenario, ambitious adoption rate of 2023 Teagasc Marginal Abatement Cost Curve (MACC) and an afforestation scenario including a 70:30 conifer:broadleaf mix, 100% on mineral soils and 17.5 kha planted per year 2030-2080.

350-lowbio S2_P2 L1: 350Mt carbon budget scenario with assumptions of limited bioenergy imports, lower agricultural activity especially sharp reductions in beef production, very ambitious MACC adoption rates which necessitates high mitigation and afforestation scenario of 50:50 conifer:broadleaf mix, 15% on organo-mineral soils and 8kha of planting per year 2030-2080.

300Mt-led S2_P2 L4: Modified 300Mt carbon budget scenario with assumptions of low energy demand, lower agricultural activity especially sharp reductions in beef production, very ambitious MACC adoption rate which necessitates high mitigation uptake by agriculture and an afforestation scenario of 70:30 conifer:broadleaf mix, 100% on mineral soils and 17.5 kha planted per year 2030-2080.

300Mt-led CH4-40% L4: Modified 300Mt carbon budget scenario to meet the 2021 Paris Test. Uses given assumptions of low energy demand but modified to achieve a 40% reduction in agricultural methane levels by 2030 and -0.3% per year thereafter and an afforestation scenario of 70:30 conifer:broadleaf mix, 100% on mineral soils, 17.5 kha per year 2030-2080.

This analysis demonstrates that **none of the CCAC's recommended climate neutrality scenarios** (Table TA1, page 31 in their Carbon Budget Proposal Report 2024) **would pass their CCAC 2021 Paris Test.** In effect, the CCAC's new assessment basis amounts to reducing Ireland's carbon budget pathway ambition, contrary to Paris ratchet intention (an ambition mechanism which allows for climate actions over time). Accepting only a temperature stabilisation at differing levels of 1.5ºC fair share overshoot is in effect a form of climate action denial relative to the Climate Act and Ireland's UNFCCC commitments to equitably limiting to 1.5ºC.

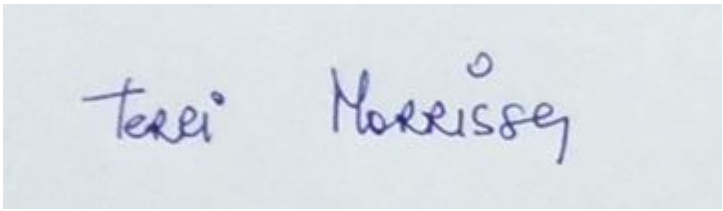
The analysis also shows how difficult 1.5ºC fair share alignment actually is and the urgency of system change for any 1.5ºC claim. An expert independent body such as the CCAC should be explicit on the basis for political choice but by being less than clear, by using a new and less demanding assessment basis without due explanation or fair share definition, the CCAC has failed to meet their responsibility.

The added *300Mt-led CH4-40% L4* scenario (orange line) in the above chart also shows how early, deep and sustained cuts in methane emissions would have a crucial effect in limiting overshoot of the CCAC 1.5ºC fair share threshold, and enabling an early return to it, because even the radical energy CO2 reductions in the UCC TIMES-Ireland Model (TIM) scenarios combined with Teagasc's voluntary technical measures are insufficient to meet the 2050 Paris Test.

All this implies that carbon-budget-aligned quantity limits on fossil fuel and nitrogen fertiliser inputs to the Irish economy are required for (minimal) 1.5ºC fair share alignment, implying urgent system change decisions away from business as usual in energy use and agriculture.

Please acknowledge receipt of this submission and let us know of any future consultation processes.

Yours sincerely,



Chair - An Taisce Climate Committee