An Taisce
The National Trust for Ireland

Climate Action Division
Department of the Environment, Climate and Communications
29-31 Adelaide Road
Dublin 2

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

23rd July 2021

Re. Consultation on the Strategic Environmental Assessment Environmental Report for the Climate Action and Low Carbon Development (Amendment) Bill 2021

A Chara,

An Taisce welcomes the opportunity to comment on the Strategic Environmental Assessment (SEA) for Climate Action and Low Carbon Development (Amendment) Bill 2021.

We note that the consultation also includes the Appropriate Assessment screening, however, this is not apparent until one reads through the details on the consultation page or looks at the uploaded documents. We recommend that similar future consultation titles should detail *all* reports, assessments, etc. open for comments in the interests of transparency and the facilitation of public participation.

An Taisce notes that the SEA for the Bill was prepared in advance of amendments made to the Bill in July and submits that the SEA should therefore be amended accordingly. We would highlight in particular the following issues.

The SEA states that under Section 11 of the Principal Act: *"...the Climate Change Advisory Council would as part of a new mandate, develop carbon budgets independent of Government."*

Furthermore: *"In the UK, the Committee on Climate Change is responsible for advising the government on carbon budgets, which are then adopted by the government through secondary legislation; the Bill foresees the Climate Change Advisory Council playing a similar role in Ireland."*

An Taisce would note that as of Friday 9th July 2021, new amendments were made to the Bill which An Taisce considers alter the role of the Climate Change Advisory Council (CCAC) in creating carbon budgets independent of Government direction, whereby the amendment states the CCAC "*shall comply with [Government-defined] regulations*". This amendment results in a change in role of the CCAC in creating carbon budgets, effectively reversing the direction of advice and information. Furthermore, if a Government fails to follow CCAC advice on regulations, the amendments do not require Government to explain why they did not follow carbon budgeting advice (such an explanation is required in the UK). This changes mean that the previous role of CCAC as assessed within the SEA is now outdated.

We would also emphasise the need for the SEA to fully assess the Bill and new amendments for alignment with the accepted scientific methodologies from the UNFCCC and the EU for determining the way in which greenhouse gas emissions and removals are counted.

Please acknowledge our submission and advise us of any further consultation periods.

Yours sincerely,

Phoebe Duvall
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