An Taisce
The National Trust for Ireland
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17th February 2025

Ms Marie Donnelly
Chairperson, Climate Change Advisory Council
McCumiskey House,
Richview,
Clonskeagh Road,
Dublin D14 YR62

info@climatecouncil.ie

Re: Carbon Budget Cycle 2: 2031-2040

Dear Ms Donnelly,

I write to you on behalf of An Taisce in reference to the recent proposals submitted by the Council to Government in relation to finalising Carbon Budget 3 (2031-2035) and adopting a provisional Carbon Budget 4 (2035-2036). I refer also to the joint letter from An Taisce and Community Law and Mediation (CLM) to the Council on this matter, of 13th November 2024.

Firstly, we would like to acknowledge the release by the Council of comprehensive documentation relating to the development of the Cycle 2 budget proposals. This is very welcome and reflects the critical public interest role of the Council in setting out an informed and independent expert view on the overarching climate mitigation *ambition* that is appropriate for Ireland, not just over these two budget periods themselves, but extending at least to 2050. Of course, we still regret that the Council chose not to make any of this documentation available while the process was in progress, and specifically did not offer any opportunities for wider societal engagement or consultation prior to finalising its proposals. We again urge the Council to critically reconsider this approach in its future work. Transparency and authentic engagement are essential to securing public understanding and support for the very challenging and disruptive measures that are progressively becoming unavoidable.

Secondly, and in relation to the substance of the proposals, it is clear to us that the Council has taken its remit very seriously, and has proposed budgets that would require very substantial — indeed radical — mitigation actions in advance of, during, and beyond the specific budget periods under consideration. The Council has clearly assessed mitigation scenarios that test at least some of the limits of overall feasibility, including technical, social, political and economic aspects; and has proposed budgets that reflect the upper range of

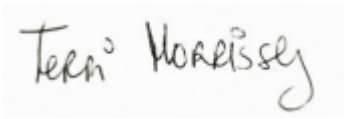
such assessment. We commend the Council for holding firm on the principle of adopting the “highest possible” mitigation ambition.

Thirdly, however, and most critically, we must raise a serious concern about what appears to be a key deficiency in the process adopted by the Council in this budget cycle. As far as we can establish, the Council seems to have abandoned, without meaningful rationale or explanation, its “Paris Test” of equitable Irish contribution to the Paris Agreement temperature goals. This was a central aspect of the Council’s first carbon budget cycle, so this apparent regression is striking. The Council’s report is, at best, extremely obscure in its discussion of this issue. At points it appears to suggest that the “temperature neutrality” criterion, used as a filter on the initial emissions scenario ensemble, somehow substitutes for such a Paris Test. The report appeals in particular to the fact that the temperature neutrality assessment was technically carried out against a background global scenario (SSP 1-1.6) that is generally regarded as representing — at a *global* level — mitigation that would be consistent with the temperature goal of Article 2.1 of the Paris Agreement. But this refers to a purely technical use of a global context to set atmospheric parameters for the evaluation of the effect of Ireland’s emissions. There is no sense in which this demonstrates that the proposed scale or speed of Irish GHG mitigation is in itself consistent with Ireland’s *equitable share* in realising such a *global* scenario. Yet the latter is precisely the test required by Article 2.2 of the Paris Agreement. This is in the form of a commitment by each Party to the Agreement to take mitigation action to achieve the temperature goal, on a basis of “... *common but differentiated responsibilities and respective capabilities, in the light of different national circumstances.”* Furthermore, the relevant Irish legislation expressly requires that, in preparing budget proposals, the Council *shall* carry out its functions in a manner that is consistent with Article 2 (i.e. both 2.1 and 2.2) of the Paris Agreement[1]. Given the nature of the technical analysis that *was* undertaken on behalf of the Council in relation to the temperature neutrality criterion, it seems clear that this could very easily have been extended to include the required test of consistency with Article 2.2 (i.e., national contribution to absolute temperature rise, on the same or similar equity basis to that used in the first budget cycle); but for some reason this analysis was either not sought, or not considered in the Council’s assessment. The Council’s report seems to separately imply that such analysis was inhibited in some way by the need to select an appropriate “reference year” for the transition from “common” to “differentiated” mitigation effort. But the Council sought specific advice on precisely this question (among others) from a professional ethicist, and was given clear advice on how to select a reference year that would be at least “minimally” defensible. Accordingly, we completely fail to understand why the Council did not proceed on the basis of that advice.

Of course, we would have much preferred to have been able to raise these points before the Council formally finalised and submitted its proposals. But, as already noted, the Council explicitly opted to exclude any public or civil society participation while the process was ongoing, so that was not possible.

Accordingly, we now request that the Council respond, as a matter of urgent public interest, with a *clear* and *unequivocal* statement on whether or how its Cycle 2 budget proposals have been assessed for full consistency with Article 2 of the Paris Agreement.

Yours sincerely,



Ms. Terri Morrissey
Chair, An Taisce Climate Committee

[1] Climate Action and Low Carbon Development (Amendment) Act 2021, s. 6A(9)(a)(i).