



7<sup>th</sup> November 2022

**Open letter on Ireland's 2023 Climate Action Plan:  
Reaching the Furthest Behind First in the Fight for 1.5°C**

Dear Minister Eamon Ryan,

- [There is no safe level of global warming](#) and the impacts of the climate crisis at just over 1°C have already been devastating,<sup>1</sup> particularly within communities that have contributed least to the problem.<sup>2</sup> Ireland's efforts to reduce emissions must be significantly increased to limit the human rights impacts of climate change and to comply with its legal duty to take climate action consistent with a 1.5°C threshold.
- The longer climate action is delayed, the more difficult it will be. As the impacts of climate change worsen, and as the window to remain within 1.5°C narrows, the policy response may become abrupt, forceful, and disorderly.
- It is critical therefore that deep and sustained reductions in emissions are implemented in the Climate Action Plan 2023, consistent with a 1.5°C threshold, to enable planning and support for the most affected workers and communities.

**We call upon the Irish Government to ensure that the Climate Action Plan 2023 provides for:**

1. **The immediate implementation of Ireland's 2021-2025 carbon budget.**
  - a) Ireland currently has one of the highest levels of greenhouse gas emissions per capita in Europe<sup>3</sup> and, contrary to longstanding recommendations of the

<sup>1</sup> <https://yaleclimateconnections.org/2022/10/world-rocked-by-29-billion-dollar-weather-disasters-in-2022/>

<sup>2</sup> Special Rapporteur on the promotion and protection of human rights in the context of climate change <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N22/438/51/PDF/N2243851.pdf?OpenElement>

<sup>3</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Quarterly\\_greenhouse\\_gas\\_emissions\\_in\\_the\\_EU#Emissions\\_across\\_EU\\_Member\\_States](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Quarterly_greenhouse_gas_emissions_in_the_EU#Emissions_across_EU_Member_States)

UN's Intergovernmental Panel on Climate Change (IPCC), Ireland's emissions have been rising rather than falling.

- b) The window to deliver the first carbon budget (2021-2025) is closing rapidly. One-third of the five-year budget period has already passed, yet Ireland's emissions rose by 5% last year and may increase in 2022.<sup>4</sup>
- c) It is still possible to stay within this legally-binding budget, but rapid, deep, and sustained reductions in emissions have never been more urgent.
- d) Moreover, the earlier action is taken, the easier it will be. If emissions had fallen last year, Ireland could have remained within the budget with annual reductions of 4.8%. However, as emissions increased by 5% last year, and may increase in 2022, compounding reductions averaging 14% in each of 2023, 2024, and 2025 may be necessary.<sup>5</sup>

## 2. The inclusion of all sectors in the Sectoral Emissions Ceilings.

- a) *Land Use Land Use Change and Forestry*: the adoption of a sectoral ceiling for the Land Use, Land Use Change and Forestry (LULUCF) sector for the period 2021-2025 has been deferred for 18 months - 3 full years into the first carbon budget period. This sector emitted more than residential buildings in 2021 and its emissions are projected to remain on an upwards trajectory.<sup>6</sup> This omission prevents any timely assessment of how much mitigation is required in the sector during this period, or to put in place corresponding measures to achieve this. Even more seriously, it makes it impossible to assess whether the ceilings across all sectors collectively meet the statutory requirement of consistency with the first budget. 2024 is far too late for this to be clarified: corrective action is needed immediately.
- b) *Unallocated Emissions Reductions*: in adopting its Sectoral Emissions Ceilings, the Government included "unallocated emissions reductions." This is inconsistent with Ireland's Climate Act, which requires that the sectoral ceilings be set "within the limits of the carbon budget" for each budget period.<sup>7</sup>
- c) *Aviation and Shipping*: emissions in the aviation and shipping sectors are clearly included within the scope of the Paris Agreement.<sup>8</sup> Mitigation of these sectors should be fully and transparently integrated into the national carbon budget framework - yet this is not even subject to public debate. The benefits of aviation are inequitably shared. Globally, only 1% of the population cause

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<sup>4</sup> Daly, H. 2022. <https://www.marei.ie/wp-content/uploads/2022/10/Prospects-for-Sectoral-Emissions-Ceilings-October-2022.pdf>

<sup>5</sup> McMullin, B. 2022. Carbon Budget 1, 2021-2025: [https://docs.google.com/spreadsheets/d/1rc\\_aoG5nEOMXsVSYEjrdmgG5nxVycuREG9JKergNUZc/edit#gid=1275654378](https://docs.google.com/spreadsheets/d/1rc_aoG5nEOMXsVSYEjrdmgG5nxVycuREG9JKergNUZc/edit#gid=1275654378)

<sup>6</sup> <https://www.marei.ie/wp-content/uploads/2022/10/Prospects-for-Sectoral-Emissions-Ceilings-October-2022.pdf>

<sup>7</sup> <https://www.irishtimes.com/opinion/2022/09/14/the-government-is-already-in-breach-of-its-own-climate-act/>

<sup>8</sup> Dehon, E. 2021. 'Don't sink Paris: Legal basis for inclusion of aviation and shipping emissions in Paris targets.' *Transport & Environment*. <https://www.transportenvironment.org/wp-content/uploads/2021/10/Briefing-paper-NDCs-legal-advice-Aviation-Shipping-Final-2021-2.pdf>

half of aviation emissions.<sup>9</sup> While comparable data is not available for Ireland, in the UK, 70% of flights are taken by just 15% of the population.<sup>10</sup>

### **3. The publication of the Long-Term Climate Action Strategy in accordance with EU and national law.**

- a) Ireland is required to submit a 'long-term climate strategy with a 30-year perspective and consistent with the EU's climate neutrality objective' by January 1, 2020. Ireland is one of only four countries that has failed to produce a long-term strategy and the European Commission recently issued a [formal notice](#) to Ireland as the Strategy is now more than two and a half years overdue.
- b) Ireland is furthermore required under the 2021 Climate Action and Low-Carbon Development (Amendment) Act to produce a Long-Term Climate Action Strategy. The development of such a Strategy shall replace the 2017 National Mitigation Plan, struck down by the Supreme Court in July 2020.
- c) The Long-Term Climate Action Strategy should bring forward the target date for complete decarbonisation in accordance with the Precautionary Principle and Common But Differentiated Responsibilities. [2050 is simply too late](#) to remain within a 1.5°C temperature threshold.

### **4. Measures to address inequality.**

- a) Wealth inequality directly contributes to climate change. Oxfam reported last year that the wealthiest 1% of the world's population are responsible for more than double the emissions of the poorest half of humanity.<sup>11</sup> Within the Irish context, the top 10% of the Irish population contributed about a third of the cumulative carbon emissions between 1990 and 2015.<sup>12</sup> Inequality both within and across countries increases the exposure of disadvantaged groups to climate change and diminishes their ability to recover.<sup>13</sup> The Climate Action Plan 2023 should prioritise [win-win climate action policies](#) that address inequality and ensure that the cost of climate mitigation and adaptation measures do not fall on marginalised and vulnerable groups. In line with the Paris Agreement, the Plan should furthermore set out how Ireland will meet its international climate financing obligations for climate mitigation, adaptation, and loss and damage.<sup>14</sup>

### **5. Measures to Address the Energy Crisis.**

- a) Measures should aim to eradicate both energy poverty and energy pollution at the same time, such as increasing retrofitting and energy efficiency measures directed at those experiencing energy poverty. Measures should seek to protect in particular groups most at risk of energy poverty, such as

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<sup>9</sup> Gössling, S., Humpe, A. 2020. 'The global scale, distribution and growth of aviation: Implications for climate change.' Global Environmental Change, Vol. 65 available at : <https://doi.org/10.1016/j.gloenvcha.2020.102194>

<sup>10</sup> Campaign for Better Transport. 'Air Traffic Controls: the Hidden Costs of a New London Runway.' Available at: <https://bettertransport.org.uk/sites/default/files/pdfs/Air%20Traffic%20Controls%20report.pdf#page=25>

<sup>11</sup> <https://oxfamlibrary.openrepository.com/bitstream/handle/10546/621052/mb-confronting-carbon-inequality-210920-en.pdf>

<sup>12</sup> <https://www.oxfamireland.org/blog/governments-must-confront-extreme-carbon-inequality>

<sup>13</sup> Islam, N., Winkel, J. 2017. Climate Change and Social Inequality. DESA Working Paper No. 152 ST/ESA/2017/DWP/152 [https://www.un.org/esa/desa/papers/2017/wp152\\_2017.pdf](https://www.un.org/esa/desa/papers/2017/wp152_2017.pdf)

<sup>14</sup> Action Aid. 2022. 'The Long Shadow of the Climate Crisis - Why a new funding facility must address loss and damage.' <https://actionaid.org/publications/2022/long-shadow-climate-crisis>

members of the Traveller community, migrants, disabled people, single-parent families, the elderly, and those living on low incomes. Forty-two civil society organisations recently endorsed [broad-ranging solutions](#) to address Ireland's unprecedented energy poverty crisis.

- b) Emissions in the transport sector continue to rise, while fuel prices place additional pressure on households amidst a cost-of-living crisis. The Climate Action Plan 2023 should deliver free and reliable public transport across Ireland. Furthermore, the Bike-to-Work scheme should be [revised to ensure it is more inclusive](#).

**6. Halt New Fossil Fuel Infrastructure and Withdraw Existing Licenses from Fossil Fuel Companies.**

- a) Make the current moratorium on LNG and fracked gas imports permanent [through legislation](#). The [independent energy security report](#) makes clear that a commercially operated or state-owned LNG import terminal, such as Shannon LNG, should not be supported as it would likely result in the importation of fracked gas and high emissions. Moreover, it would provide no guarantee of energy supply.
- b) [The independent energy security report](#) further makes clear that additional gas reserves from existing exploration licences, such as from Providence or Corrib, should not be supported as “additional domestic production of natural gas could lock Ireland into a high-gas energy market.”

**7. Introduce a moratorium on new data centres**

- a) The continued and rapid expansion of an industry reliant on additional energy consumption is inconsistent with a transition to a completely decarbonised economy and society. An immediate moratorium on the development of data centres should be imposed until an assessment of what is needed to meet the carbon budget from 2021-2025 is carried out.

**8. Ensure a Just Transition.**

- a) We fully support the [recommendations of the Just Transition Alliance](#) and call upon the Government to immediately establish a National Just Transition Commission, in advance of formal legislation, based on social dialogue and comprised of representatives of government, trade unions, employers, affected communities and civil society. The Commission would be charged with developing the national framework and blueprint for Just Transition covering the entire economy, in line with the ILO Guidelines for a Just Transition.
- b) Ensure the full recognition of unions across all workplaces and sectors of the economy.
- c) Measures must be taken to ensure that the transition to more sustainable forms of agriculture provides farmers with a fair price for their produce and tackles hunger internationally.
- d) Furthermore, the [Just Transition guidelines](#) should be embedded as a guiding principle of the Climate Action Plan 2023, and across all government policy, law, and procurement. The delivery of a rapid and just transition should be built into the mandates of all public bodies, local authorities, and regulators.

Yours,

*Community Law & Mediation*



*An Taisce*



*Friends of the Earth*



**Friends of the Earth Ireland**

*Social Justice Ireland*



*TASC*



*Action Aid*



*Environmental Justice Network Ireland*



*Irish Heart Foundation*



*Friends of the Irish Environment*



*The Irish Traveller Movement*



*The Northside Partnership*



*Age Action*



*The Climate and Health Alliance*



*Futureproof Clare*



*Galway Public Participation Network*



*Pavee Point*



**PAVEE POINT**  
TRAVELLER AND ROMA CENTRE

*INOUE*



*Safety Before LNG*



*Asthma Society of Ireland*



*Community Work Ireland*

