

Trócaire Submission to Consultation on the National Mitigation Plan SEA Scoping Report, October 2015

Trócaire welcomes this Consultation on the National Mitigation Plan Strategic Environmental Assessment (SEA) Scoping Report. As detailed in Trócaire's previous consultation submission, our extensive research with partner organisations in Programme Countries has indicated that climate change is having a range of adverse effects on vulnerable communities, most notably on small scale farming which the majority of poor communities depend on for their livelihoods.¹ As emphasised in the Encyclical of Pope Francis, *Laudato Si'*, justice must be at the heart of developed countries' response to these adverse effects. This means that Ireland's Low Carbon Transition & Mitigation Plan must drive effective, equitable and efficient emission reductions across all sectors in line with historical responsibility and greater capacity. It is also in the context of a climate justice approach that the SEA must include an analysis of current and potential impacts on human well-being and socio-economic development in developing countries.

It is stated at the outset of the SEA Scoping Report that there must be a strong economic dimension to the work that Ireland is carrying out to develop the Low Carbon Transition & Mitigation Plan. It is recognised that economic considerations should not be discounted in the preparation and assessment of appropriate policy responses. However, it is important to be clear that that basis and impetus for immediate and concrete emissions reductions across all sectors does not simply stem from, and indeed must not be limited by, short-term economic considerations. Action is a moral imperative necessitated by the injustice that those most vulnerable and least responsible for driving global increases in temperature are the most affected by its consequences. It is also incumbent on policy-makers to take fair and equitable steps now in order to maintain and protect our environment for future generations.² It is also for this reason that the Climate Bill sets out that the preparation of the Low Carbon Transition & Mitigation Plan must be informed by the principle of climate justice.³

Trócaire welcomes the clear recognition of the EPA's latest projections which note that Ireland will face difficulty in meeting its 2020 emissions reduction commitments and is not on track towards decarbonising the economy in the long term. Naturally, these projections are based on the achievement of policy initiatives produced prior to 2015 and do not account for proposals detailed in the Food Wise 2025 industry strategy and in the forthcoming White Paper on Energy. Therefore, the environmental impacts of all

¹ See for example [Changing Lives: Climate Change in the Developing World](#), 2008; [Climate change: Trócaire's policy recommendations](#), 2011; [Shaping Strategies: factors and actors in climate change adaptation](#), 2012. Trocaire, [Feeling the Heat, How climate change is driving extreme weather in the developing world](#), 2014.

² 'Intergenerational solidarity is not optional, but rather a basic question of justice, since the world we have received also belongs to those who will follow us.' (159).

³ See <http://www.labour.ie/press/2015/07/02/minister-kelly-proposes-significant-amendments-to/>

current and proposed sectoral plans must be assessed and relevant initiatives aligned with objectives under the Low Carbon Transition & Mitigation Plan, including recent departmental strategies. A failure to re-examine the impacts of all sectoral plans in accordance with objectives under the Low Carbon Transition & Mitigation Plan, in particular those which would lock-in long-term increases in emissions, would constitute a damaging 'business as usual' approach.

Based on the plans, policies and programmes outlined Chapter 4 of the SEA Scoping Report, are there any other key relevant international, national or regional plans, policies or programmes that should be considered in the SEA Environmental Report?

- It is essential that decisions on policy responses as part of the Low Carbon & Mitigation Plan are underpinned by the Precautionary Principle and that their effects are not deemed to be divorced from impacts outside of Ireland, in particular on developing countries. The SEA must take into account relevant action areas in Ireland's Policy for International Development *One World, One future*, in particular efforts to ensure food security, climate resilience and human rights protections. (This policy builds on the 2012 Framework for Sustainable Development, *Our Sustainable Future*, which should also be noted in relevant policy documents for consideration.) In order to ensure the effects of policy responses do not undermine Ireland's development objectives, EU requirements under Policy Coherence for Development (PCD) must be taken into account. ⁴ This means that proposed actions must be assessed on the basis of PCD and where necessary, developed with adequate safeguards to ensure that they do not result in unintended impacts on the rights and resilience of vulnerable communities.⁵

Risks requiring further analysis as part of PCD include:

- Displacement: Actions which incentivise large-scale imports of first generation biofuels must be assessed due to the devastating effects of biofuels expansion on land resources and food growing areas in developing countries (often through 'land grabbing').⁶ The World Bank identified "demand for biofuel feedstock as a reflection of policies and targets in key consuming countries" as being one of the main drivers of the global expansion of cultivated area.⁷ Similar concerns apply to other forms of bioenergy, which are foreseen as

⁴ Since the signing of the Lisbon Treaty in 2009, Policy Coherence for Development is a legal obligation of all EU member states. Article 208 states that all EU policies must take into consideration development objectives

⁵ Trócaire Briefing Paper [Achieving Policy Coherence for Development through a Whole of Government Approach](#) September 2013

⁶ See Trócaire Briefing Paper, [Biofuels: fuelling poverty and environmental degradation](#), 2013

⁷ World Bank (2011) *Rising Global Interest in Farmland*, World Bank: Washington, DC. As noted in Action Aid, Act On It: 4 Key Steps to Prevent Land Grabs, May 2015 http://www.actionaid.org/sites/files/actionaid/act_on_it_-_four_key_steps_to_stop_land_grabs.pdf

major forms of renewable energy in Ireland. The effects of Indirect Land Use Change have also meant that such biofuels production often does not result in significantly lower carbon emissions.⁸

- An increasing dependence on animal feed imports to increase production can also inadvertently result in 'land grabs', where land needed by local communities for their own food production is being taken over to raise animal feed.⁹ This can also result in increases of the cost of associated food stuffs such as grain.

- Market Distortions: Subsidized EU exports to developing countries have served to counteract the development of local markets by displacing local production while adding to emissions through long-haul transport.¹⁰ Dumping of subsidized meat products which do not internalize the full environmental and social costs of production products is a particular risk.

Do you agree with the list of potential significant effects that have been identified in Chapter 5 of the SEA Scoping Report? Should any be added or removed? Are there any other existing environmental issues which should be considered?

While the Low Carbon Mitigation & Action Plan is necessarily national in focus in terms of policy responses, it is evident that the effects of climate responses, be they positive or negative, are not only national in nature. As noted above in relation to Policy Coherence commitments above, direct and indirect impacts outside of Ireland must be taken into account as part of the SEA analysis. Trócaire's 2014 report *Feeling the Heat* comprises a comprehensive review of observed changes in climate and impacts in five of Trócaire's programme countries.¹¹ The report's case studies provide detailed evidence of the detrimental effects of climate change on human well-being and socio-economic development in these countries. The SEA should include an assessment of direct and indirect impacts on key areas detailed in Trócaire's report including food security, water resources, migration and livelihoods.

The scope of effects on human health should also be expanded. The study recently produced by the Lancet Commission in 2015 on the impact of climate change on health is particularly pertinent in this regard, detailing a range of impacts including under-nutrition, respiratory diseases, mental illness and cardiovascular diseases. The analysis indicates that future projections represent an unacceptably high and

⁸ See Trócaire Submission to the Green Paper on Energy Policy in Ireland, 2014 and Trócaire Briefing Paper, Biofuels: fuelling poverty and environmental degradation, 2013

⁹ CIDSE [Agriculture: from Problem to Solution - Achieving the Right to Food in a Climate-Constrained World](#)

¹⁰ See Action Aid, [Milking the poor How EU subsidies hurt dairy producers in Bangladesh](#) September 2011 Misereor, [Who feeds the world? The impacts of European agricultural policy on hunger in developing countries 2011](#); and Misereor and Heinrich Böll Foundation [Slow Trade – Sound Farming A Multilateral Framework for Sustainable Markets in Agriculture](#)

¹¹ Trocaire, [Feeling the Heat, How climate change is driving extreme weather in the developing world](#), 2014.

potentially catastrophic risk to human health, recommending the early phase out of coal and for a decisive policy package which targets air pollution from the transport, agriculture, and energy sectors, with the objective of reducing the health burden of particulate matter.¹²

In relation to the sectors to be addressed within the Low Carbon Transition & Mitigation Plan by the relevant departments, it is evident that electricity generation within the energy sector must be a key focus given the range of current and potential impacts on GHG emissions, air quality and biodiversity. However, policies relating to energy production and energy use for thermal purposes¹³ should not be excluded from the assessment. The Department of Energy's 2014 Green Paper underlines that the production, delivery and use of energy must be addressed by policymakers and all three have environmental implications. As stated in the Scoping Consultation, after agriculture, usage by industry and residential sectors make up the majority of emissions. The latest analysis by the SEAI also indicates that thermal purposes accounted for 34% of total primary energy supply in 2013 and 41% of final energy demand.¹⁴ Our choices on the nature, type and origin of fuels used to provide heating is an important facet of Ireland's energy policy and should be included from the environmental assessment. Equally, the environmental impact associated with ongoing hydrocarbon exploration and production must form part of the assessment, particularly given its direct effect on Ireland's long-term decarbonisation objectives and taking into account that more than two-thirds of current commercially viable fossil fuels globally will need to remain in the ground.¹⁵

Effects on air quality from changes in the agriculture sector must also be taken into account in line with the need to ensure reductions in methane and nitrous oxide emissions. The results of the assessment of significant effects should also include an overview of historical and projected emissions data.

¹² Lancet Commission on Health and Climate: [Change Health and climate change: policy responses to protect public health](#) 2015

¹³ That is energy utilised outside of the transport and electricity generation sectors for industrial and residential purposes, as well as for agriculture and other services.

¹⁴ Sustainable Energy Authority of Ireland, Energy in Ireland Key Statistics, 2014.

¹⁵ 'Carbon in energy reserves and energy infrastructure', pp. 259ff. in World Energy Outlook 2012, International Energy Agency

Are there any other significant information sources that should be considered in addition to those listed in Chapter 6 of the SEA Scoping Report?

- *Fair Shares: A Civil Society Equity Review of INDCS*, November 2015.
- Lancet Commission on Health and Climate: *Change Health and climate change: policy responses to protect public health*, 2015
- Stephen Flood, NUIM for Stop Climate Chaos, *Projected economic impacts of climate change on Irish agriculture*, 2013.¹⁶
- Trocaire, *Feeling the Heat, How climate change is driving extreme weather in the developing world*, 2014.
- Trócaire Briefing Paper, *Biofuels: fuelling poverty and environmental degradation*, 2013
- Trócaire Briefing Paper, *Achieving Policy Coherence for Development through a Whole of Government Approach*, 2013

Do you have any suggestions in relation to the overall approach to alternatives presented in Chapter 7 of the SEA Scoping Report?

It is essential that assessment of reasonable alternatives takes into account the realistic eventuality that substantially greater emissions reductions will be required towards 2050 (over and above the National Policy Position). As detailed in the recent report *Fair Shares: A Civil Society Equity Review of INDCS*¹⁷, even if countries meet their INDC commitments (including EU Member States), the world is likely to warm by a devastating 3°C or more. Taking into account the commitment to climate justice included in the Climate Bill, it is important that the assessment includes a scenario of emission reductions in line with Ireland's fair share based on calculations of Climate Equity included in the *Fair Shares* report. A scenario of increased ambition and action will also likely be necessitated by higher emission reduction obligations under a new international climate agreement to be finalised in Paris this December.

As stated above, the examination of any 'business as usual scenario' should not take as a starting point the (initial/continued) implementation of current or proposed departmental strategies and policy options which would result in actual increases in emissions. This is essential given that recent sectoral policies will have to be revised and brought into line with objectives under the Low Carbon Transition & Mitigation Plan.

¹⁶ This includes an analysis of the environmental impacts of climate change on Irish farmers and farming. See <http://www.trocaire.ie/resources/policyandadvocacy/projected-economic-impacts-climate-change-irish-agriculture>

¹⁷ *Fair Shares: A Civil Society Equity Review of INDCS*, November 2015.

In response to example questions included in the consultation, all emitting sectors should be included. As above, effects from changes in fuel use should not be limited to electricity generation but should comprise the entire sector including energy production and energy use for thermal purposes. The assessment must also be carried out on the basis of achieving near-term overall absolute emission reductions at national level. Aggregate reduction strategies which defer to, or promote a reliance on, potential collective EU measures should not be included. The results of all assessments including associated data should be clearly presented.

Do you have any comments regarding the draft SEA Objectives outlined in Chapter 7 of the SEA Scoping Report?

The SEA Objectives, in particular Objective 2, 6, 7 and 8, should be updated to take account of Ireland's commitments under Policy Coherence for Development and the assessment criteria broadened to ensure the development of appropriate policy responses which do not undermine the rights and resilience of vulnerable communities in the developing world.

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