

## **General comments on DECLG Background Document on Ireland's first National Low Carbon Transition & Mitigation Plan**

The document provides the basis for an initial round of consultation to inform the development of Ireland's first draft National Mitigation Plan (NMP). It appears that the main aim of this particular consultation is to gather the views of the public and stakeholders on both the opportunities and challenges that arise in the low carbon transition process, so as to inform the development of the NMP. Not surprisingly at this early point, the background document does not set down in any detail specific options for sectoral mitigation measures. Only a very general potential framework is presented.

At this stage in the development of the NMP, it seems to me that there are some important overarching points that need to be made:

[1] It is essential that Ireland shows leadership in this area and presents a NMP that demonstrates unequivocally that Ireland is prepared to step up and play its fair part in meeting the global climate challenge.

[2] Obviously, this commitment must be backed up by a range of specific measures to reduce emissions across the various sectors identified in the background document and in line with the national transition objective. It is clear from the background document that agriculture is to be treated as a special case (p10), and this is borne out by *Food Wise 2025*. The environmental implications of the expansion of the agriculture sector must be fully integrated into the relevant decision-making processes in an explicit and transparent manner.

The required reductions in Ireland's greenhouse gas emissions demand serious interventions across the four key sectors. If targets for agriculture are pitched at a lower level, then sharper reductions will obviously have to be made across the other sectors. The NMP must spell out clearly how the required *overall* reduction in emissions is going to be achieved on schedule across the four sectors.

It is striking that the background paper fails to get across the key message that rapid and deep change on a massive scale is required across the four sectors if Ireland is to meet its targets and play its fair share in tackling the global climate challenge.

[3] Beyond specific sectoral measures, the NMP should highlight explicitly the fact that all members of society have a role to play in meeting the climate challenge. In other words, it should set out the overall societal effort required in clear terms. A related point here concerns how the Government communicates to the general public the urgency of the climate challenge and the key role of individual responsibility.

[4] Mitigation, adaptation and, of course, development are interconnected. The links between mitigation, adaptation and development should be elaborated clearly in the NMP.

[5] It is essential to integrate the concept of climate justice in the specifics of the NMP.

[6] The NMP should elaborate on specific innovations in climate finance to underpin national mitigation and adaptation efforts.

[7] The NMP must be the subject of a strategic environmental assessment (SEA). Given the significance of the NMP, and the many complex issues arising here, it is essential that a substantial period of public consultation is provided for so as to facilitate early and effective participation in the SEA process as required under the Aarhus Convention and European Union (EU) law.

[8] The background document refers to a forthcoming screening process to determine whether Appropriate Assessment is required under the Habitats directive. This screening exercise should be conducted in an open and transparent manner from the very outset so that the public can verify that there is compliance with EU law obligations.

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