



## **Environmental Pillar**

WORKING FOR A SUSTAINABLE FUTURE

### **The Environmental Pillar comments on the 2014 review of the National Reform Programme**

**10/04/2014**

#### **The Environmental Pillar thanks the Minister Donohoe for the opportunity to comment on the update.**

The concept of sustainable development is markedly absent from this draft. This is particularly concerning given the context of the National Reform Plan in terms of the European Semester. The Europe 2020 vision is for smart, sustainable and inclusive growth. As part of the mid term review timetable, it is critical that we address our failing at a national level to put the principles of sustainable development at the heart of our recovery strategy.

The National Reform Programme sits under the Europe 2020 strategy yet it fails to have a substantive evaluation of the integration of sustainable development into national policies and strategies.

At a national level we have many cross-departmental plans and policies that reflect the Europe 2020 language of smart, sustainable, green growth. For example. Our Sustainable Future, Action Plan for Jobs and Food Harvest 2020. However there is no analysis of how this rhetoric of sustainability is being integrated into policy implementation.

The National Reform Programme needs to address the issue of sustainability in the policy framework for economic recovery. The economic collapse in Ireland went hand in hand with a societal collapse, mass emigration, increased suicide rates, and tremendous strain on families. To focus recovery purely on economic metrics is an attempt to rebuild the demonstrably flawed model. Incorporating social and environmental considerations in to economic decision-making is critical not only to meet the rhetoric of such high level strategies as already mentioned, but also to facilitate a robust and viable recovery for Ireland.

**In March 2013 The Environmental Pillar submitted the following comments on the review of the National Reform Programme:**

*The reporting on climate change in the 2013 report was completely inadequate. It did not give the basic information one would expect, i.e. how we were doing and how we were predicted to do in relation to our target. That information if given would demonstrate that we are not on track to meet the trajectory established by the Effort-Sharing Decision (ESD).*

*Having considered how we are doing in comparison with our targets, we need to consider how our policy process is working.*

*Ireland had national climate change strategies from 2000 until 2013, the end of the Kyoto Period. The recently published Heads of a Bill recognises the need for such plans and proposed to put them on a statutory footing. However, our last strategy was produced in 2007 and was aimed at compliance with our Kyoto Protocol obligations. It has expired. We have made good progress in relation to our 2020 renewable energy targets. Our progress in relation to energy efficiency has recently slowed dramatically, which raises major concerns in relation to our achievement of our 2020 energy efficiency target. We have no strategy aimed at our 2020 ESD target, i.e. for the non-traded sector.*

*In this context it is not surprising that the EPA reports that we are not on track.*

*At the same time as we fail to put a climate change strategy in place, policies and measures are continuing to be implemented in the ESD sector without being subjected to full analysis in relation to their climate impacts. Finance has been allocated to roads projects and cut from public transport projects; we are not aware of a specific climate impact analysis of this decision but we know it will lead to greater emissions. The same can be said of the implementation of the Agri sector policy, Food Harvest 2020.*

*In summary we recommend that the report include*

- A quantitative analysis of progress towards the Climate and Energy Package Targets*
- A qualitative analysis of policy in relation to renewable energy, energy efficiency and ESD sector emissions*
- An analysis of the integration of climate change objectives into the policy processes in the ESD sector.*

We welcome the inclusion of more detail on the climate change policy development process in the third draft. However, unfortunately, key aspects of our comments have not been taken into account.

In addition to the above general comments which remain valid, we have the following specific comments

1. "Ireland will meet its EU greenhouse gas emissions reduction target for the purposes of the Kyoto Protocol, on the basis of the response set out in the National Climate Change Strategy 2007-12."

While the Kyoto Protocol target is not part of the Reform Programme commitment on climate change, it is worth correcting this by pointing out that not all of the response set out in the National Climate Change Strategy 2007-2012 was implemented. Instead economic recession has brought about the emissions reductions. The report should discuss what aspects weren't implemented, why not, and what lessons have been learnt.

2. Progress in relation to the Development of Climate Policy and Legislation

The 2012 National Reform Programme report said:

"Against this background, a comprehensive Review of National Climate Policy was issued in November 2011 and a programme for the development of national climate policy and legislation was issued in January 2012."

The "Roadmap for Climate Policy and Legislation" issued on 23<sup>rd</sup> January 2012 is on the Department of the Environment's website at <http://www.environ.ie/en/Environment/Atmosphere/News/MainBody,29241,en.htm>

It sets out the following timescale:

#### "2013

"February Minister to release final report from NESC Secretariat.

"March – June Oireachtas Joint Committee to consider the NESC reports and Heads of climate bill, consulting with stakeholders as determined by the Committee.

"End June Oireachtas Joint Committee to report on national climate policy development and appropriate legislation.

"Quarter 3/4 Having regard to –

- the National Climate Policy Review,
- the reports from the NESC Secretariat and the Oireachtas Joint Committee on the Environment, Transport, Culture and the Gaeltacht, and
- ongoing evolution of climate policy within EU level and at a wider-international level under the UN Framework Convention on Climate Change,

"Government to adopt a national policy position on transition to a low-carbon future, including appropriate institutional arrangements, and finalise the

introduction of climate legislation.”

This report should recognise that the original timescale of the adoption of a national policy position on transition to a low-carbon future, institutional arrangements and the introduction of climate legislation has not been met and explain why.

3. Figure 7 shows trends in GHG emissions. Predictions for GHG emissions have also been produced by the EPA. These show that we are not on track to meet our effort-sharing decision targets for most of the 2013 to 2020 period. These EPA predictions should be included in the report.

We welcome the inclusion in the draft of the projections for GHG emissions to 2020 (Figure 3.), something we had recommended this year and last year. However Figure 3 seems to be a reworking of Figure 2 of the EPA report; we would query why the original figure has been changed to omit the With Additional Measures Scenario.

That EPA report indicates (Table 1) that non-compliance with the ESD targets is projected to begin in 2015 in the With Measures Scenario and 2016 for the With Additional Measures Scenario. The draft Update based on the report states that non-compliance will start in 2017.

(Note, the link to the EPA report “Ireland’s Greenhouse Gas Emission Projections 2012-2030” has changed. It is no longer at the location given in the footnotes, i.e.

[www.epa.ie/pubs/reports/air/airemissions/irelandsgreenhousegasemissionsprojections2012-2030.html#UyLgdPI\\_s6E](http://www.epa.ie/pubs/reports/air/airemissions/irelandsgreenhousegasemissionsprojections2012-2030.html#UyLgdPI_s6E). It is at:  
[www.epa.ie/pubs/reports/air/airemissions/EPA\\_GHG\\_Emission\\_Proj\\_pub\\_2013\\_FINAL.pdf](http://www.epa.ie/pubs/reports/air/airemissions/EPA_GHG_Emission_Proj_pub_2013_FINAL.pdf) )

4. “In 2011, some 73% (41.7Mt CO<sub>2</sub>e) of Ireland’s greenhouse gas emissions fell within the scope of the effort-sharing decision, with the agriculture sector accounting approximately 44% (18.5 Mt).”

This is misleading, as in fact it is 44% of the 73%.

5. The report should discuss the difficulties experienced with the rollout of renewable energy infrastructure which we consider to be linked to the lack of Strategic Environmental Assessment and measures being taken to address this.
6. We are dismayed by the discussion of biofuels in the report. Ireland has increased its biofuels blending obligation at a time when the European Commission has proposed to limit the incentives to biofuels and the science is clear that biofuels without adequate sustainability criteria (including taking account of indirect land use change) are worse than fossil fuels. This increase was made with no consultation with environmental organisations and undermines Ireland’s credibility in claiming to address climate change on the basis of good science and in ensuring coherence between energy,

environment and development policies. The fact that the report itself implies that any revision resulting from the current Commission proposal will require further increases in our biofuels obligation is shocking.

## 7. Progress in relation to Energy Efficiency

The 2013 Update included the following:

“The Better Energy Programme has consistently delivered energy savings in the domestic, commercial and public sectors over the past four years, while a retrofit programme for low-income housing was integrated in 2009. Given the economic challenges faced by the country, the Better Energy Programme is moving from a grant-based programme to one that relies upon sustainable financing. A number of initiatives are under development including the recent launch of an Energy Efficiency Fund, the publication of a National Energy Performance Contracting Policy Framework and the call for Exemplar Projects. A project team has also been established to evaluate the potential for a national Pay-As-You-Save scheme in the domestic sector.

This year's draft says:

“The Better Energy Programme has consistently delivered energy savings in the domestic, commercial and public sectors over the past four years, while a retrofit programme for low-income housing was integrated in 2009. Given the economic challenges faced by the country, the Better Energy Programme is moving from a grant-based programme to one that relies upon sustainable financing. A number of initiatives are under development including the recent launch of an Energy Efficiency Fund, the publication of a National Energy Performance Contracting Policy Framework and a suite of Exemplar Projects.

It appears from the text that no progress has been made but the proposal for a Pay-As-You-Save scheme has been abandoned.

In fact, the cuts to insulation grants in 2011 have led to a steep fall in the rate of retrofit and it is important that this policy challenge be fairly reflected in the Update. The Update should give figures for the numbers of buildings undergoing thermal retrofit every year and the anticipated energy savings.

The Programme for Government said: “After 2013, we will roll out a ‘pay as you save’ scheme to continue home energy efficiency retrofitting work without recourse to public funding.” Has Pay as You Save really been wound back from a firm commitment to something whose potential is to be evaluated? What hope is there of meeting our Energy Efficiency target in these circumstances?

8. In relation to transport, there is a discussion of biofuels but no discussion of transport investment and policy decisions, spatial planning, demand reduction, the position of public transport, walking and cycling, the tax regime applicable to private motor vehicles etc.

9. While there is discussion, however disappointing, of transport, resource efficiency and renewables, there is no reference to policy and measures in the agriculture sector. Nor is there a reference to the Food Harvest 2020 document, apparently government policy, which envisages a significant increase in production from GHG-intensive agricultural sectors. Discussion of our work to meet our climate targets has to take account of sectoral policies which increase emissions.
10. Similarly there is no discussion of emissions from land use and land use change.
11. There is a mention of Food Harvest 2020 reaching its targets. The lack of an SEA on this national plan being implemented by a High Level Implementation Group chaired by the Minister for Agriculture on the basis that it is not a national plan has been of concern to civil society and the ENGO sector for a number of years. The recently published Environmental Analysis Report highlights the problems with achieving these targets. It specifies that a high technology approach needs to be adopted, and that mitigation measures need to be put in place. Neither of these is in process, despite implementation of FH2020 since 2010. This should be referenced in the draft report for accuracy.
12. Furthermore, the section on Climate Change and Energy states that the RDP is being informed by FH2020. This would suggest that European funded public money is being used to offset the environmental costs and mitigation measures that will be required to deliver a plan that the government consider an industry lead strategy. This approach would be in conflict with the polluter pays principle and the issues around this should be noted.
13. The Action Plan for Jobs has been a successful tool for delivering a measureable form of growth in the country. Ensuring that the recovery is robust and of sound foundations should be satisfied by the inclusion of the principles of sustainable development in the national jobs strategy. The whole economy needs to be “greened”. The inclusion of a “green economy” as a separate sub section, under “Sectoral Opportunities” does not integrate sustainability in to the strategy. It is therefore in conflict with other national and European strategies.

In summary, the report does not set out whether we are on trajectory in relation to the 2020 targets or what we are going to do in order to meet them. Neither does it give a critical analysis of the lack of sustainability in the implementation of national plans and strategies. The headline of smart, green, inclusive growth is in danger of being abbreviated to “Growth”. The mistakes that led us to a European wide recession, the disintegration of the banking sector, the resultant fragmentation of economies, the weakening of the Euro itself must not be repeated.

The purpose of a reform programme should be to reform, and this draft does not provide an honest and full disclosure of the challenges. Therefore, it will be an insufficient tool in establishing the solutions.

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