

# Proposed Carbon Budgets, 2031-2040

Opening statement for the Oireachtas Joint Committee on Climate,  
Environment and Energy

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We thank the Joint Committee for the opportunity to provide evidence on the second cycle of carbon budgets for Ireland, covering the periods 2031-2035 and 2036-2040, as [proposed by the Climate Change Advisory Council](#). We will briefly summarise our assessment of the proposals and our recommendations for action. We have submitted a separate briefing document with more detailed explanation and motivation.

In our initial [submission to the public consultation on the proposals](#), we identified several issues of concern particularly in relation to the statutory requirement for consistency with Article 2 of the [Paris Agreement](#). At that point, we recommended that the budgets should *not* be adopted pending satisfactory clarification on this central issue. The Council have since provided [a summary response](#) on this question, in the form of a so-called “Paris Test” of the second cycle budget proposals. We have been engaged directly with the Council to fully understand the detailed rationale and basis of this additional analysis. We would like to acknowledge here our appreciation of the responsiveness of the Council in these interactions.

**However: having now reviewed this cycle two “Paris Test” analysis in detail, our view is that it is unsatisfactory on multiple distinct grounds.**

In brief:

1. The Test involves a comparison between the modelled future contribution of Ireland to warming and the remaining “available warming” at global level. Under global scenarios consistent with the Paris limit, the global temperature peak would occur around 2050, and subsequently decline to safer levels. Similarly, under the domestic Irish emissions scenarios modelled by the Council, the Irish contribution to warming would peak around 2050 and subsequently decline significantly. However: for the purposes of the Test, the Council have chosen not to compare the *peak* of Irish warming contribution to the *peak* of global warming (around 2050), but rather to compare the significantly lower Irish warming contribution *as of 2100* to the global peak. In our view, this amounts to an “apples and oranges” comparison which fundamentally undermines the coherence and validity of the Test. If all countries adopted this approach then it would “allow” collective global scenarios where the temperature peak could substantially exceed the 1.5°C limit.
2. The Test relies on choosing a so-called “reference year” as a basis for equitable differentiation of effort among the Paris Agreement parties. The Council adopted 2020 for the Paris Test applied to the *first* cycle of carbon budgets, and proposes to retain that for the assessment of the second cycle. However: this now conflicts directly with [professional ethical advice](#) commissioned by the Council themselves, which found, retrospectively, that that choice lay “... well outside of the climate ethics consensus”. In essence, choosing a late reference year “grandfathers” (or ignores) Ireland’s significant historical contribution to global emissions in the period up to 2020, which is of course very unfair when it comes to the question of what Ireland’s share should be of the remaining global carbon budget consistent with limiting heating to +1.5C. It is essential that this choice be critically re-evaluated.
3. The Test methodology makes no provision for representing the warming contribution of emissions from international aviation and shipping. This is despite the [published international expert legal view](#) that the Paris Agreement *does* require countries to take responsibility for such emissions. It appears to us that a plain reading of the provision of the Act for the carbon budgeting process to be consistent with the requirements of Article 2 of the Paris Agreement positively *requires* such provision to be made.

4. Finally, we have significant concerns regarding more technical issues in the implementation of the Test. These centre on the use of potentially inconsistent approaches to estimating “available warming” at global level versus the Irish contribution to warming.

**Taking all these issues into consideration, we reiterate our position that the proposed budgets should *not* be adopted as they stand. Instead, we recommend that the Council be requested to commission an open and independent peer review of the appropriate methodologies for assessment of carbon budgets (and their underlying emissions scenarios), fully reflecting all the relevant provisions of the Act; and to re-assess their budget proposals in the light of the outcomes from that review.**

We acknowledge that this would inevitably involve some additional lapse of time before the second cycle of budgets can be approved. Nonetheless, we believe that this is merited.

**We emphasise that such a delay must not be taken as an impediment to full and urgent implementation of the *already approved first cycle of carbon budgets*.**

The adoption of a complete set of sectoral emissions ceilings for the periods 2026-2030 and 2031-2035, *within the cumulative constraints of carbon budgets 1 to 3*, has already been delayed for far too long.

**Even more importantly, it is essential that the next update of the Climate Action Plan presents *credible* policies and measures to come into budget compliance by 2030; and to lay the foundations for the progressively deeper cuts in emissions required beyond 2030.**

It is no longer a question of merely “doing our best”: we must *do what is necessary*. There is now a very strong case for the establishment of mechanisms to dynamically regulate the upstream *inputs* to Irish societal activities, such as fossil fuels, via *some form of equitable rationing*.

Finally, we must note the harsh reality that the direction of geopolitics has swung away from co-operation on climate action, and toward conflict and the undermining of international institutions.

**We urge the Committee to consider how to significantly upscale and *prioritise* Ireland’s diplomatic effort on climate action so that our local efforts can make the maximum possible contribution to catalysing the required *emergency* global response.**

Thank you again for your invitation, and we look forward to the discussion.