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Dear Minister,

Thank you for your letter of 19th May. The Council is happy to engage with you and your team on the Draft Long Term Strategy (LTS). We have examined the LTS and would like to make a number of points.

We see the LTS as being a strategic statement guiding policy and investment decisions, supporting a sustainable society and economy, and avoiding investment becoming locked-in to stranded assets and high emissions activities. It is vital that the LTS sets out the urgency of accelerated action across all sectors of our economy and society. No person, corporate entity, Government Department or Agency should be left in any doubt of the level of priority that should be attached to the achievement of the national climate objective.

There is a significant path dependency in respect of our long-term strategy dependant on the choices that are made over the next year. 2023 is a critical year because it should finally see settlement on all of our medium-term sectoral emissions ceilings. It is vital that Ireland gives the right signals internationally and domestically by settling outstanding issues in respect of these ceilings this year, and thereafter fully reflecting this settlement and its implications in the finalised LTS and also in the finalised National Energy and Climate Plans due to be finalised by mid-2024.

We provide our feedback under a number of headings below.

1. Articulating the national climate objective

The LTS presents the achievement of Ireland's national climate objective as a future where Irelands emissions profile in 2050 is one of net zero Carbon Dioxide (CO₂) and Nitrous Oxide (N₂O) emissions combined with significant reductions in methane (CH₄). It is important that the finalised LTS explains this in greater detail, illustrates how such an ambition has no additional impact on temperature over the longer term and demonstrates how this represents a fair share in terms of Ireland's contribution to the overall global effort. To this end there also needs to be a clearer and more developed exposition of Irelands projected emissions profile over the period to 2050. Finally, it is imperative that Ireland's next LTS will also incorporate emissions in both the international marine and aviation sectors in its scope.

2. Vision for Ireland

The LTS should be a reference document whereby Ireland sets out what kind of future is envisaged. This should be underpinned by the best understanding of how the country is likely to develop over the coming decades and reflect on our best understanding of the range of futures that could unfold. A prime example of this relates to the expected demographic changes between now and 2050 and other projected changes to our economy and society. The Central Statistics Office population projections for 2051 ranged between 5.6m and 6.8m¹ persons representing a considerable change from population today and a wide variety of potential outcomes. Recent data suggests that Ireland should be planning for a population at the upper end of this range². Our population is projected to have aged significantly in that time too as the population aged over 65 expected to grow from 630K to 1.5-1.6m persons by 2051. As such the profile of Ireland's energy demand is likely to look considerably different in 2050. The current expression of Government's understanding of our future is through Project Ireland 2040 and the National Development Plan. This plan and all Government's horizon scanning needs now to extend to 2050 and should be well founded in detailed and up to date demographic, energy systems and other modelling. Similarly, energy, emissions and economic projections need to explicitly extend to this date based on plausible scenarios of the future.

The vision also needs to make more explicit what choices are being made or at least considered in respect of our collective future. This can include a number of areas of policy including but not limited to spatial policy, economic development and infrastructure investment. Choices around spatial policy will determine which kinds of heating and transport systems are required in the future. Our economic development will play a very significant role in determining what the scale and type of energy demand will look like in future. Decisions around infrastructure will be shaped by these and other factors. Many of the other infrastructural changes that may be required can take decades to deliver from initiation to completion, so it is vital that this LTS mobilises the required preparations in this regard.

The vision should detail where there are opportunities to build Ireland's resilience to Climate Change impacts whilst also reducing our emissions using nature-based solutions and other approaches. Adverse impacts from human induced climate change will continue to intensify. It is important that the LTS sets out clearly how Ireland's management of these impacts will become more clearly elaborated through processes such as a renewed National Adaptation Framework and the forthcoming work on the National Climate Risk Assessment. There is the potential for a very high level of public sector investment being required to protect our coastlines and it is vital that the LTS, as a steering policy statement, demonstrates a clear awareness of and preparedness for dealing with this issue.

3. Scenarios

The Council's Annual Review of 2021 stated that the "National strategic response can be greatly enhanced by the exploration of multiple scenarios, responding to uncertainty and

¹ [Population Projections Results - CSO - Central Statistics Office](#)

² Ireland had an estimated 2022 population of 5.1m ([Population and Migration Estimates April 2022 – Central Statistics Office](#)). Data from CSO suggests that net inwards migration has been running at an average rate of 31.5K at the upper end of the range of population projection scenarios from 2016 to 2022 (<https://data.cso.ie/table/PEA03>). Further there has been a very significant influx of people fleeing the war in Ukraine ([Arrivals from Ukraine in Ireland Series 10 – Central Statistics Office](#)) with over 56K registering for PPSNs with the State in total since May 2022. (<https://data.cso.ie/table/UA07>)

the needs of long-term strategy”³. The use of and analysis of various scenarios to identify potential pathways to achievement of the overall objective is quite common place in work carried out by other Parties to the Paris Agreement⁴. A LTS, having provided clarity on the endpoints in so far as possible should examine and develop scenarios in which the long term objectives could be delivered. Such analysis would assist with developing a clearer and more accessible understanding of the kinds of choices which will need to be made to achieve the national climate objective in full and on time. Typically a scenario analysis facilitates the narrowing of the range of decisions that will need to be made at a sectoral level in terms of future mitigation and can involve a broad range of stakeholder⁵.

4. Pathways

Taking into account the uncertainty around future development and having settled on a long-term objective and considered a range of scenarios it is important to consider different pathways which deliver against this aspiration. Some of the issues that should be addressed specifically include:

The level of quantitative detail provided across these pathways needs to be significantly enhanced beyond the current draft and there needs to be a move more generally system wide towards a consideration of the future using the endpoint of 2050 whilst still acknowledging and addressing the increasing uncertainty that this brings. This needs to result in a clearer vision of when each sector will be decarbonised. Given the uncertainties these could be expressed by way of a latest year when the specific emissions endpoint (eg net zero CO₂ in sector X by 2035/2040 etc) would occur. All subsequent planning and decision making by each sector needs to be informed by these end points alongside the existing constraints imposed by the carbon budgets and sectoral emissions ceilings.

As much of our sectoral emissions reductions will rely on electrification there needs to be a very clear roadmap for the **Electricity Sector** out to at least 2040 and an exposition of the choices (including fuel mix, grid infrastructure etc) which will be needed to deliver the rapid decarbonisation envisaged. The potential role for hydrogen in our energy future remains unclear. There needs to be greater certainty provided on how it will interact with other elements of Ireland’s broader strategy for decarbonisation between now and 2050 so that sectors are clear on their future role in its development in Ireland⁶.

In its recent letter to the Heads of Government⁷ the Council set out three areas where early and sustained intervention are required in order to ensure that the national climate objective is kept within reach. In the context of Ireland’s LTS we would point in particular to the point around the need for a focus on compact development which has a very significant impact on emissions from both the **Built Environment and Transport**. Poor planning has and can result in considerable inefficiencies from at least two perspectives. Firstly, it embeds transport demand within our economy and prolongs our car dependency. Secondly it results in a continued dependency on individual and distributed

³ See Section 9.1 of [CCAC AnnualReview 2021.pdf \(climatecouncil.ie\)](#)

⁴ Ricardo compiled an assessment of the LTS submitted by 1st Feb 2023 by EU Member State. Summaries by Member State can be seen at [National long-term strategies \(europa.eu\)](#). See also analysis carried out by UNFCCC Secretariat: [LT-LEDS Synthesis Report | UNFCCC](#).

⁵ See Ricardo report above

⁶ The Council prepared a working paper on the role of hydrogen: [Hydrogen in Ireland web version.pdf \(climatecouncil.ie\)](#)

⁷ [Letter to Government re Planning in Ireland .pdf \(climatecouncil.ie\)](#) sent May 2023

heating systems at the expense of the significant potential benefits of shared network heating⁸. These impacts are such that the LTS ought to set out a vision for how these are addressed in future.

On **Built Environment** there needs to be a much clearer vision (and timeline) of how the older element of our building stock will be managed over the coming decades. According to Census 2016 over 1.1m households were living in dwellings constructed prior to 2000⁹. Over 700K of these are in urban areas and 400K in rural areas. Specific, cost effective and very clear pathways need to be developed detailing how these homes will be heated consistent with the objective for net zero carbon dioxide emissions by 2050 with consideration of the interaction between heat pump and district heating deployment. Delays to the publication of the report on District Heating are of particular concern to Council in this regard.

In the **Transport Sector** there should be a much greater focus on the Avoid-Shift-Improve framework, active travel and public transport infrastructure delivery and the critical role effective spatial planning to cater for our growing population will play. An essential element is the roll out of the necessary public infrastructure (metro, rail, surface transport) with deadlines for completion of large projects. Given the scale and project duration of these projects it is important that planning for the investment required is accelerated and that the LTS lays bare the scale and likely timing of the significant public investment that will be required over the decades ahead. For passenger vehicles, a clear timeline for the likely phase-out of ICE vehicles in Ireland is required given EU legislation in this area which will inevitably lead to a growing difficulty to fuel and sell ICE vehicles as a consequence of the 2035 deadline associated with the EU legislation in this area. Freight transport, which will be a growing share of transport emissions as passenger vehicle emissions begin to fall requires both a medium-term and a long term policy in order to give clear signals to the large numbers of actors in this sector.

Emissions from our **Industry Sector** will inevitably come under pressure as the ETS cap falls towards zero over the period to 2040¹⁰. This should be considered in greater detail in our LTS. However, domestically, there needs to be a much clearer exposition of how Ireland will develop the building stock and other aspects of our infrastructure of the future with much less reliance on this highly carbon intensive material. In addition, clarity on the role of Carbon, Capture and Storage for difficult to decarbonise industry sub-sectors such as cement production is necessary to plan for the associated infrastructure development. Equally, the current LTS fails to adequately address one of the primary drivers of energy demand in Ireland today, that being data centres. Whilst these offer opportunity to Ireland our LTS should reflect in more detail on how this development can be delivered in a sustainable manner that is supportive of our national climate objective, our vision for 2050, and is consistent with the achievement of our sectoral emissions ceilings.

As regards **Agriculture and Land** there is a particular need to set out more clearly the long term objectives in the final report and to explain how and to what extent it is anticipated that residual emissions from agriculture will be counter-balanced by removals from the land and/or other technologies. Given the temperature neutrality based approach

⁸ The Council commissioned the OECD to prepare a report entitled [Redesigning Irelands Transport for Net Zero: Towards systems that work for people and the planet](#)

⁹ Summary results for Census 2022 reveal that this figure may be even higher (c. 1.2m households). The precise breakdown into urban and rural is not yet available: <https://data.cso.ie/table/FY034B>

¹⁰ [The Emerging Endgame: The EU ETS on the Road Towards Climate Neutrality by Michael Pahle, Claudia Günther, Sebastian Osorio, Simon Quemin :: SSRN](#)

in the LTS there will inevitably be residual methane and nitrous oxide emissions arising by 2050 and it would be vital to set out a pathway that can balance the latter emissions whilst controlling the former as appropriate. The LTS should provide analysis of the strengths and weaknesses of various mitigation options as currently understood, with a particular focus on options for methane reduction and the vital role of afforestation, and develop pathways that are consistent with the national climate objective and the vision for 2050.

Pathways discussed should also consider the impacts of policy on various other policy objectives in line with the requirements under the Act. This analysis should include **Biodiversity and Just Transition** as well as co-benefits of climate action such as improved air-quality.

Finally we would wish to stress the importance of Ireland maintaining and updating its LTS in line with the Climate Act and our obligations under EU and International law. We see the strategy as a central plank of policy that should steer short- and medium-term decision making alongside our legislated Carbon Budgets and Sectoral Emissions Ceilings. Consistent with your Department's objective to be a climate leader internationally Ireland's LTS should be seen as an exemplar for other Parties to the Paris Agreement. The Council stands ready to support you in this process.

Kind regards,



Marie C. Donnelly

Chair

Climate Change Advisory Council