



Sinn Féin Members of the Joint
Committee on Climate Action

Pathways to Equitable and Sustainable Climate Change in Ireland

Minority Report

March 2019



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Introduction

The Joint Committee on Climate Action was constituted in 2018 primarily to consider the deliberations of the Citizen's Assembly and determine how the recommendations might inform *Ireland's National Mitigation Plan*; the draft *Integrated National Energy and Climate Plan* and the recently published *National Development Plan*. The Committee was also authorised to consider other such related matters and to report to both Houses of the Oireachtas.

As a cross-party forum deliberating on transformative change of grave importance, it was initially anticipated that consensus might be attainable across all issues. However, as the work progressed, a number of divergent views emerged. Whilst all members agreed on most of the substantive forces and factors contributing to climate change, there were diverse views as to the most effective solutions. Many of these were significantly brokered and the majority of the proposals for solutions that were formulated in the Majority Report were fully supported by Sinn Féin.

Throughout the process, Members were aware that transformative change, innovation, and progress in one area can have profound consequences in another and in making its deliberations the Members of the Committee, for the most part, were cognisant of the need for balance to be struck between these often competing interests. In many instances, this was achieved.

However, as the process neared its conclusion, a number of divergent policy positions emerged to which Sinn Féin simply could not agree. Some of the proposed policy recommendations are simply flawed and entirely lacking a substantive evidence base; others seek to protect commercial interests from bearing responsibility for their share of their polluting actions, and others simply evaded the political responsibility to make difficult and unpopular decisions. As these redline issues in particular impacted on the immediate and future wellbeing of Ireland's most vulnerable citizens, Sinn Féin was not prepared to negotiate away their future solvency, welfare, or opportunities for a compromised consensus.

Having arrived at a decision that Sinn Féin would not endorse the Majority Report, it also became evident that political opponents would seek to shape a narrative that the Party did not in fact have substantive grounds for deviation. In view of this, it became apparent that a Minority Report would be necessary in order to communicate the provenance of the issues which separated us. These are outlined in the following chapters.

It is also regrettable that the Majority Report fails to adequately consider climate issues in an all-Ireland context. Sinn Féin does not overlook this important factor. All references to Ireland in this Minority Report should be read to relate to the whole island of Ireland, not simply the Irish state.

Carbon Tax

It is the issue of imposing an increased carbon tax that has led to the greatest divergence between Sinn Féin members on the Committee and others. Sinn Féin is clear and unambiguous on the issue of increases in carbon tax – we are absolutely opposed to them.

Carbon taxes are ineffective. The international evidence is conclusive on this fact. Emissions have continued to rise and 2018 saw an EU record high in emissions. It merely provides the illusion of doing something. This should be obvious from the fact that the fossil fuel industry supports such taxes, as it allows them push inadequate solutions such as natural gas as they emit less carbon, instead of zero carbon, renewable options.

Carbon tax is a form of austerity that will disproportionately affect low and middle income households, pushing many hard pressed families over the edge and into poverty. We need investment, not austerity. Studies undertaken by the ESRI in 2008 and again in 2018 state quite categorically that universal Carbon Tax disproportionately harms lower income households. It is estimated that around 400,000 households in this State suffer from fuel poverty.

The difference between the pro-carbon tax parties who endorsed the Majority report is not down to whether or not they pick the pockets of ordinary households, merely on how they would spend the spoils.

Sinn Féin will not stand over any report or policy that endorses regressive increases in carbon tax.

Recent Sinn Féin Environment Legislation and Policy Documents

Notwithstanding the positions outlined in the remainder of the document, Sinn Féin's record on its commitment to climate action, the environment and a sustainable future, is evidenced in the suite of legislative documents it has moved through various stages of the Oireachtas and in its party policy documents, as listed in the following Schedule:

Bills Awaiting 2nd Stage

- a) Waste Reduction (Miscellaneous) Provisions Bill 2017
- b) Forestry (Planning Permission) (Amendment) Bill 2018
- c) Local Authority Climate Action Obligation Bill 2018

Bills at Committee Stage:

- a) Island Fisheries (Heritage Licence) Bill 2017
- b) Microgeneration Support Scheme Bill 2017
- c) Local Government (Water Pollution) (Amendment) Bill 2018

Bills voted down at 2nd Stage by Fine Gael and Fianna Fáil

- a) Extreme Weather (Miscellaneous Provisions) Bill 2018
- b) Wind Turbine Regulation Bill 2016

Party Policy Papers

- a) Biogas in Ireland Policy Paper
- b) Powering Ireland 2030 Policy Paper
- c) Tackling Fuel Poverty
- d) Achieving Energy Efficiency in Housing

Summary of Recommendations

Chapter 1: A National Governance Framework

High Level Recommendation

That the Government legislate as recommended by the Majority Report, and within those timeframes. In addition, Sinn Féin calls for;

- a) stronger powers for the Climate Action Council and the Joint Standing Committee than those outlined in the Majority Report;
- b) an all-Ireland approach to climate action, through the establishment of an all-Ireland implementation body on climate action and environment;
- c) a more ambitious target of 80% renewable share of electricity generation.

Subsidiary Recommendations

In exercising its functions the framework should provide for *inter alia*:

- a) That the Climate Action Council be provided with the equivalent relevant powers of the C&AG in legislation, with Constitutional provision made if necessary;
- b) For key public bodies, as designated by the Climate Action Council, expertise in climate action discipline will be a required competence for their boards. This shall form part of the criteria for filling such board positions through the Public Appointments Service;
- c) That the Climate Action Council be provided with additional powers relating to State and Semi State Companies such as An Post, ESB and other relevant state owned companies. While there are restrictions regarding commercial independence of such companies, the relevant line ministers represent the taxpayer as shareholder and should ensure that the public interest and public good are served by the operation of these companies. This should include those banks that still have a considerable state shareholding, that they would strongly consider the climate impact of their lending decisions.

Chapter 2: Supporting a Just Transition

High Level Recommendation

That the Government put in place mechanisms to develop a national legislative, policy and regulatory framework for a Just Transition¹. This framework must be constructed in 2019 for inclusion in the final version of the **National Energy and Climate Plan 2021-2030** due for submission to the European Commission By December 2019.

¹ International Labour Organisation (ILO) Guidelines for a Just Transition *Towards Environmentally Sustainable Economies and Societies for All*.
https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=2ahUKEwjj3Jacr5PhAhXWWWhUIHUhCdSIQFjAAegQIARAC&url=https%3A%2F%2Fwww.ilo.org%2Fwcmsp5%2Fgroups%2Fpublic%2F---ed_emp%2F---emp_ent%2Fdocuments%2Fpublication%2Fwcms_432859.pdf&usg=AOvVaw1ITOd-fWB2exVsbsXHYnE9X

Subsidiary Recommendations

In exercising its functions the framework should provide for *inter alia*:

- a) National, regional and sectoral adaptation plans to prepare workers, enterprises and the wider community for adaptive change;
- b) Prioritised and stimulated ethical investment in low-emission, job-rich sectors and technologies in localities and sectors most affected by or vulnerable to, change;
- c) Mechanisms for meaningful dialogue and enforceable Agreements between investors, employers, workers, advocacy groups and non-profit community organisations;
- d) Compelled Transitional Justice Impact Assessments of both public climate policies and private industry initiatives;
- e) Training and skills development, which are key to support the deployment of new technologies and foster industrial change;
- f) Social protection, along with active labour markets policies; and a dedicated advocacy agent (which might for example be housed within the Citizens Information Service);
- g) Local economic diversification plans that support decent work and provide community stability in the transition. Communities should not be left on their own to manage the impacts of the transition as this will not lead to a fair distribution of costs and benefits;
- h) Equality Impact Assessments which differentiate impacts of transition on protected categories of people and;
- i) Rural & Peripheral Impact Assessments which differentiate the impact of transition on rural and island communities.

Chapter 3: Citizen and Community Engagement

High Level Recommendation

Sinn Féin supports the integration of the artistic community into initiatives at local and national level to raise awareness and encourage action and activism on climate and environmental issues.

That by December 2020 the Department of Arts, Culture and Heritage develop a five year strategy which anchors Climate Action as a priority cultural theme and anchors it both in its outworkings and in its governance.

Subsidiary Recommendations

- a) Sinn Féin supports the appointment of an artist in resident in each local authority, who will have among their responsibilities, the duty to raise awareness of climate change within their local authority, and to work with the new SPC to this effect.
- b) Allocation of dedicated resources for Artists in the Community exploring themes of Climate Change and Sustainable Development;
- c) Allocation of funding under the Percent for Arts Scheme dedicated to public works on the theme of Climate Change;

- d) That in 2019 the Dept of Arts, Culture and Heritage establish protocols for Environmental Reporting of Arts Council and Heritage Council funded Agreements with third party beneficiaries

Chapter 4: Education & Communication

High Level Recommendation

That accurate information, adequately communicated is vital to progress on climate action. The scientific realities should be clearly stated and the rationale for headline targets and strategies should be made clear to all. However, healthy and vigorous debate should be encouraged on how these targets and objectives should be reached. Only through such informed debate will there be proper and substantial public engagement with this issue.

Subsidiary Recommendations

- a) The Department of Education and skills should immediately reverse the decision to remove geography as a core subject in the Junior Cert cycle;
- b) A ban on advertising by companies whose primary business is in the extraction and use of fossil fuels;
- c) Ensure the Climate Action Council has authority to prevent abuse of public funds for political purposes under the guise of public information on climate change;
- d) Strengthen advertising standards to avoid 'greenwashing';
- e) Provide for the education and training of relevant and emerging professions in Ireland and reduce dependent on expertise from outside the country.

Chapter 5: Unlocking Potential

High Level Recommendation

That in seeking to take advantage of the opportunities presented by tackling climate change, that the public good be the central consideration.

Subsidiary Recommendations

- a) That priority be given to R&D investment in public bodies, state and semi-state companies and public third level institutions over private, for-profit companies;
- b) That where R&D investments are made in private companies, those companies with progressive ownership models be prioritised, and that measures are taken to ensure the public good is secured over any innovations and that their impact is not curtailed profit considerations;
- c) That the Government makes protecting environmental defenders a core part of its international work on climate action and that it ensures the supply chains of Irish companies and semi-states are free from environment degradation and human rights compliant.

Chapter 6: Financing Climate Action

High Level Recommendation

That there be no increase in Carbon Tax and that the Government and other parties abandon their drive towards imposing another regressive tax on the Irish people.

Subsidiary Recommendations

- a) That the Government in 2019 introduce a Financial Instrument to ring-fence (hypothecate) and freeze the entire proceeds of the exiting €20/Carbon Tonne price, where such price is sustained at the current rate until December 2022 at which time the efficacy of the hypothecation be reviewed;
- b) Place obligations on those who put fossil fuels on the market to encourage customers to renewable energy alternative;
- c) Policy and legislative changes to facilitate microgeneration for householders and businesses and to develop other sources of renewable energy such as offshore wind, solar, biogas and biomass;
- d) Use a combination of low cost loans and grants, green bonds to enable householders and businesses to switch to renewable power and to retrofit.

Chapter 7: Energy Security

High Level Recommendation

We need to outline a clear energy mix of the different technology types needed for our electricity generation in the coming years and this must ensure a balance of on-demand and intermittent sources. Electricity will be a key source of energy into our future for both heat and transport. This will also be a job creator and aid in reducing agricultural emissions and transport emissions.

Subsidiary Recommendations

- a) Develop on-demand renewable energy sources such as biogas, biomass, storage technology and hydroelectric to complement intermittent source. These need to be prioritized;
- b) Large investment in the grid is needed to deal with small scale renewables as well as dealing with the switch to electric vehicles and heat pumps;
- c) Reform planning processes to provide greater certainty for security of supply and potential investors including the establishment of a single planning body for the approval of offshore applications;
- d) Alternative sources of renewable fuel for heavy vehicles needs to be developed. This includes CNG from biogas.

Chapter 8: Agriculture, Forestry & Peatlands

High Level Recommendation

That Government in association with the Department of Agriculture; the Department of Climate, Energy and Communications and other stakeholders, complete the development

of a sustainable integrated strategy before March 31st 2020; which stimulates the production of both food and energy in the agri-sector, whilst balancing the need for food and energy security in equal measure.

Subsidiary Recommendations

Notwithstanding the broader scope of the strategy, it will make provision to:

- a) Undertake a thorough assessment to determine the agricultural, technical and economic viability and feasibility of short-rotation crop production for biomass and/or biofuel use and distribution, and to quantify its short, medium and long-term potential as a source of supply for power plant electricity generation and local heat generation centres;
- b) In the context of Brexit, to liaise with the Department of Agriculture, Environment and Rural Affairs in the North of Ireland, to establish co-operative strategies for abatement of GHG emissions and to mitigate any impact in the Republic from higher levels of airborne emissions north of the Border;
- c) The immediate discontinuation of financial inducements for monoculture afforestation, and the immediate introduction of grant schemes and tax incentives which favour the planting and maintenance of sustainable forestry and hedgerows;
- d) To undertake an immediate assessment of fertiliser, manure and slurry practices and identify opportunities for sourcing, supply and adaptation to more environmentally sustainable products and practices;
- e) To legislate for ecological assessments of all afforestation applications (outside of EU designated sites) to mitigate the loss of biodiversity-rich areas to forestry, and to protect ground nesting birds, pollinators and species rich grasslands;
- f) To complete the National Hedgerow Survey using LiDAR technology and develop a National Hedgerow Conservation Strategy to maximise the carbon and biodiversity co-benefits of Ireland's unique hedgerows;
- g) To legislate for ecological assessments of all afforestation applications (outside of EU designated sites) to mitigate the loss of biodiversity-rich areas to forestry, and to protect ground nesting birds, pollinators and species rich grasslands;
- h) Sinn Fein supports an island wide solution to addressing climate challenge and that Department of Agriculture, Environment and Rural Affairs in the north and Department and Agriculture, Food and the Marine establish a joint working plan/group and work with all relevant stakeholders

Chapter 9: Housing & Built Environment

High Level Recommendations

The Department of Housing, Planning and Local Government must produce a plan with clear deadlines for the energy retrofitting of all residential dwellings. This plan should outline clear funding commitments and ambitious targets for the energy retro fit of both local authority and private dwellings.

Subsidiary Recommendations

- a) Increase investment in the deep retrofitting of all social housing stock held by local authorities and approved housing bodies;
- b) Expand range of SEAI grant measures to include double-glazing of single glazed buildings;
- c) Increase grant scales up to 100% for lowest income deciles with an incremental downward tiered scale to 50% for higher income deciles;
- d) Weight all measures towards improving efficiencies from lowest G-Rated properties to achieve mid-range C-Rating;
- e) Introduce low interest Green Mortgages and low interest retrofit top-up options to existing mortgages;
- f) Examine the introduction of supports for Group purchasing schemes to enable collectives of householders to undertake certifiable self-retrofit initiatives to gain savings through bulk purchases and efficiencies of labour;
- g) Commission the:
 - a. ESRI to undertake new National Survey of Housing Quality by December 2021;
 - b. CSO to quantify and correlate the tenure and solvency status of each dwelling in the State.

Chapter 10: Sustainable Transport

High Level Recommendation

- a) The Department of Transport, Tourism and Sport develop Sustainable Regional Inter-modal Transport Strategies to 2035, which incorporate the city transport strategies and connects them to towns in the regions with populations of 1500 or more. Such strategies should provide for a significant shift from private vehicle and road freight use, to intermodal solutions which include bus, rail, cycling and waterway modalities. Each regional strategy should be completed for report to the Standing Committee no later than June 30th 2020;
- b) The Department of Transport, Tourism and Sport:
 - a. In association with the Department of Education and Skills, undertake a national baseline study of current School Transportation system which documents the current routes operated by Bus Eireann and associated sub-contractors; private coach and bus operators; and private vehicle subsidies (eg Gaelscoileanna). The study, which should capture route logistics, passenger journeys, capacity and operating costs, should be completed for report to the Standing Committee no later than Dec 31st 2019;
 - b. In association with Waterways Ireland to Commission a survey for completion by March 31st 2020, of the inland waterways including the Shannon-Foynes Waterway, the Suck and Nore tributaries, and the canal infrastructure to document the accessibility, capacities and maritime limitations for barge freight haulage, and identify interconnectivity potential for intermodal freight transportation;

- c) Public transport investment is key in reducing transport emissions. Our population is due to increase by 1 million by 2050 and it is imperative that the state facilitates change to encourage people out of cars and into buses, trams and trains. The government has consistently underfunded the three CIÉ companies. Due to increases in employment and population in recent years public transport services on key routes are at capacity and existing services can't accommodate demand. The government must prioritise investment in rail, tram and bus services to ensure that public transport is available to all in our cities, and that it is the "go-to" method of commuting.

Subsidiary Recommendations

- a) Sinn Féin believes that the fastest, most efficient and more practical measure we can introduce to reduce transport emissions is to address the significant deficits in existing public transport services, and to prioritise the improvements in state wide infrastructure as part of that process;
- b) The benefits of doing this will also address another major issue highlighted at the Committee, namely the challenges around transport in rural Ireland which have led to a huge over-reliance on cars;
- c) The poor state of rural transport options due to decades of underinvestment has led us to a place where there is now a rural transport crisis, evidenced by the lack of options for rural people which was laid bare in the aftermath of recent changes in road traffic law;
- d) People living in rural areas in many cases do not have a choice other than to drive. The solution to this is to increase investment in existing rural transport provision whilst ensuring that incentives exist to encourage behavioural change;
- e) Investment in the electricity grid to cater for a rise in electric vehicles;
- f) Encourage the development of CNG from indigenous biogas for the haulage industry.

Chapter 11: Waste Management

High Level Recommendation

Tackling waste in our society also helps tackle climate change. It addresses emissions in terms of production and collection and obligations must be placed on the manufactures in the first instance.

Subsidiary Recommendations:

- a) Establish a deposit return scheme for certain waste material, so that ordinary households are incentivised to return material;
- b) Place obligations on manufactures to reduce the amount of packaging produced in the first instance;
- c) Ban single use plastics with exemptions for certain products such as medical equipment;
- d) Ensure greater State control of household waste collection.

Chapter 1: A National Governance Framework

The Majority Report notes in the opening paragraph that “the State has, in the past, committed to targets to reduce GHG emissions, starting with the Kyoto Protocol. However, Ireland’s performance in meeting international obligations has to date been poor.”

This is further corroborated and quantified in detail in the remainder of the Chapter and is a damning indictment of the abject failure of successive administrations to address the issue of climate change in an adequately serious manner.

Whilst the Committee worked collectively and earnestly to appraise the extent of the challenge and to come up with a policy and regulatory framework, the timeframe did not provide for adequate investigation of international governance models of best practice. Sinn Féin is of the opinion that the success of Ireland’s trajectory will be very much determined by the efficacy of the multi-level governance model and regulatory framework selected.

Whilst the proposals to further empower the Climate Advisory Council and establish a compliance Committee are an indication of commitment towards governance responsibility, Sinn Féin is concerned that adequate and robust due diligence has not been undertaken to identify the most effective instruments required.

Climate action can be taken through a portfolio of policy instruments including directly regulating emissions, phase out strategies, pricing controls, subsidies, agreements, performance standards, and informational instruments. Experience elsewhere indicates that ill-guided policy direction can push public spending towards costly and unsuccessful abatement measures, which has a regressive impact on society and the economy. Numerous failures worldwide have emerged where political and economic decision-making was lacking foresight.

With this in mind, there is a need for reliable criteria to guide and justify selection between contending approaches to climate action. Whilst it is widely agreed that no single model can be considered a generic fit for all purposes, a number of criteria have emerged² to evaluate individual policies and their combination in a coordinated portfolio mix:

- a) **Environmental effectiveness:** How well does a policy instrument meet its intended environmental objective and how certain is its level of environmental impact?
- b) **Distributional considerations:** How does the policy impact consumers and producers and can it be considered fair and equitable?
- c) **Institutional feasibility:** Is the policy instrument likely to be viewed as legitimate, gain political acceptance, be adopted and ultimately implemented?
- d) **Cost effectiveness:** Can the policy achieve its objectives at a lower cost than other policies and does it create revenue streams that can be reinvested?

² (IPCC, 2007: 751).

It is evident that, whilst these criteria are widely advocated, there arises occasion when they may come into competition with each other rendering concessions inevitable. Such are the challenges of an ethical, transparent and robust national framework.

There is a need for a multi-level whole of Government approach to tackling climate change, including all Departments and state bodies, and which deploys the powers of the state to regulate, legislate, and compensate to ensure the mobilisation of resources to tackle the problem. This may necessitate direct intervention in the economy, contrary to the ideology of the establishment parties. Also, equality and human rights should be the core of any governance framework.

Sinn Féin asserts that an All-Ireland framework is required to mitigate environmental destruction and advance adaptive measure for a sustainable regenerative society. Climate change and extreme weather events do not recognise partition and it is logical that small island with two jurisdictions diverging on energy and climate policy would be highly problematic for the effectiveness of those policies.

The Majority Report states that we must put “the structures and systems in place that will ensure that everyone in the State, in whatever role or capacity, can work together to make Ireland compliant with our international climate change obligations.” The reality is that certain industries and corporations will not “work together” with the State to tackle this crisis; indeed, they will seek to frustrate any effective action. The extent of the fossil fuel industry lobbying is often underestimated, and needs to be challenged. These industries need to be forced to meet their climate obligations by the State through legislation and regulation.

Tackling climate change will require hard choices. However, unlike those parties supporting the Majority Report, we do not see blaming and punishing ordinary people as ‘the hard choices’. As with austerity, the political and economic establishment see their problems as everyone’s problems; yet, their profits are theirs alone. Real hard choices mean breaking this cycle and standing up to the elites. It means rejecting climate action as a means to deliver more austerity and instead making it a policy of public investment in the economy and society.

Bobby Sands once said, “everyone, Republican or otherwise has their own particular part to play. No part is too great or too small; no one is too old or too young to do something.”

Sinn Féin supports this approach to climate action; *all of Government, all of society, and all of the economy.*

The Citizens’ Assembly

R1: To ensure climate change is at the centre of policy-making in Ireland, as a matter of urgency, a new or existing independent body should be resourced appropriately, operate in an open and transparent manner, and be given a broad range of new functions and powers in legislation to urgently address climate change.

Such functions and powers should include, but not be limited to:

- a) *To examine any legislative proposals, it considers relevant to its functions and to report publicly its views on any implications in relation to climate change; the relevant Minister must respond publicly to the views expressed in a [any] report prior to the progress of the particular legislative proposal;*
- b) *To propose national sectoral targets for emissions reductions, to be implemented by the Oireachtas, with regular review and reporting cycles;*
- c) *To institute proceedings in any Court for the purpose of obtaining redress of any wrong in respect of any matter concerning climate change.*

It is clear that if the recommendation of the Citizens' Assembly is to be realised, there is a need for a radical and transformative change of culture and structure in the political and regulatory environment of the State which undoubtedly requires substantial state intervention. Regrettably, the Majority Report leans towards a light-touch market-led approach underpinned by a corporate governance ethic of comply or explain.

Sinn Féin accepts the logic of the statement in the Report that, given the lengthy time span over which planning is required, "it should not matter what type of government or what parties from the Oireachtas form the Government, the programme will be broadly the same." This should mean all parties committing to uphold the minimum targets and outcomes and an all-party commitment to consensus building and compromise where possible. However, Sinn Féin will not be complicit in propping up a trajectory which is misguided, unjust, or unsustainable.

Limitations of the Majority Report

Sinn Féin supports recommendations 1 a-c of the Majority Report in principle. The real test will lie in how seriously Government take these commitments, as evidence to date has shown that Government parties have been strong on rhetoric but weak on action.

Sinn Féin will seek to work with other parties to ensure the legislation proposed is strong and robust, and will table amendments if required.

We support the proposal to establish a new Standing Committee would be modelled on the role of the Public Accounts Committee and understand that this will include powers of compellability. If this is to be given proper expression, the proposed Climate Action Council must also have similar powers to the C&AG and play a similar role in the Committee. This means the same ability to access any required information from Departments and public bodies, to provide forensic audits to the Committee for examination, and to attend the Committee in a similar capacity as the C&AG.

Sinn Féin also supports recommendations 1 d-h. We commit our party to be bound by such targets as a minimum. Sinn Féin would go further than the Majority recommendation in on the renewable share of electricity generation, and would commit to a minimum target of 80% renewables by 2030. Sinn Féin has produced detailed and achievable proposals on how this could be achieved in our policy document *Powering Ireland 2030*.

While Sinn Féin would support recommendations 2 and 3 of the Majority Report, we do not see them meeting the standard mentioned above that would be similar to the C&AG. Sinn Féin will seek to amend legislation to strengthen it if required.

Sinn Féin supports recommendation 4, while recognising that any such structure will only be as good as the political will underpinning it.

High Level Recommendation

That the Government legislate as recommended by the Majority Report, and within those timeframes. In addition, Sinn Féin calls for:

- a) stronger powers for the Climate Action Council and the Joint Standing Committee than those outlined in the Majority Report;
- b) an all-Ireland approach to climate action, through the establishment of an all-Ireland implementation body on climate action and environment;
- c) a more ambitious target of 80% renewable share of electricity generation.

Subsidiary Recommendations

In exercising its functions, the framework should provide for *inter alia*:

- a) That the Climate Action Council be provided with the equivalent relevant powers of the C&AG in legislation, with Constitutional provision made if necessary;
- b) For key public bodies, as designated by the Climate Action Council, expertise in climate action discipline will be a required competence for their boards. This shall form part of the criteria for filling such board positions through the Public Appointments Service;
- c) That the Climate Action Council be provided with additional powers relating to State and Semi State Companies such as An Post, ESB and other relevant state owned companies. While there are restrictions regarding commercial independence of such companies, the relevant line ministers represent the taxpayer as shareholder and should ensure that the public interest and public good are served by the operation of these companies. This should include those banks that still have a considerable state shareholding, that they would strongly consider the climate impact of their lending decisions.

Chapter 2: Supporting a Just Transition

Just Transition is an ethical framework which seeks to secure jobs, livelihoods, incomes, communities, and quality of life when societies are shifting from an extractive to a regenerative economy. Built upon sustainable development principles, processes, and practices, *Just Transition* seeks to mitigate the impact of transformative climate change actions on the most vulnerable in society.

It is an essential component of *Climate Justice* which recognises global warming as an ethical and political issue, rather than purely environmental or physical in nature. The fundamental proposition of a *Just Transition* is that those who are least responsible for climate change suffer its gravest consequences. In this context, the transition itself must be just and equitable, redressing past harms, and creating new relationships of power for the future through reparations. If the process of transition is not just and equitable, the outcome will never be.

The rationale for transitional justice comes from evidence which shows that if millions of jobs can be created out of the transformation towards a clean economy, some sectors in which millions of workers are engaged such as energy extraction and production, manufacturing, agriculture and forestry, transport, construction, and waste management will undergo dramatic restructuring.

Sinn Féin recognises that, in the past, significant periods of economic restructuring have often happened in a chaotic fashion. This resulted in ordinary workers, their families, and communities bearing the brunt of the transition to new ways of producing wealth which lead to unemployment, poverty, and exclusion.

Of particular concern during the process of change are:

- workers in vulnerable industries
- people living below living-wage incomes
- entire communities adjacent to fossil fuel extraction sites and energy production plants
- unwaged living in poverty
- those living in sub-standard dwellings
- the elderly
- unwaged care workers in the home
- those living in remote rural areas or island communities

Transitional Justice must be viewed as a continuum both in terms of preventive strategies to mitigate or eliminate punitive impacts as well as counter measures for deployment of emergency responses to unforeseen events. Responsibility for Just Transition must be compelled within each and every Government Department, state body, NGO, state contractor and sub-contractor and by employers, industry, public benefit entities, and the community and voluntary sector.

This requires deep structural change which must be supported by a legislative framework and Government policy, and must be financed by the industries and sectors that have benefitted most from extraction by way of reparation and by new industries set to profit most from new technologies.

The Citizens' Assembly

It is evident from the Citizen Assembly deliberations that, whilst it did not discuss a *Just Transition* per se, the members articulated a deep understanding of the need to protect vulnerable citizens and sectors.

Limitations of the Majority Report

The Majority Report failed in its obligations to embrace the principles of *Just Transition*, failed to provide for the embedding of transition systems throughout the structures and entities of the State, and failed to make recommendations which would ensure the protection of the livelihoods of vulnerable citizens and communities. This is particularly disappointing given that Ireland was a signatory to the Silesia Declaration at COP24 in December 2018.

The Majority Priority Recommendation to establish a Task Force is inherently flawed and demonstrates spectacularly the lack of understanding of the concept of Transitional Justice, and the structural changes in legislation and policy which need to happen to safeguard workers and communities. A Taskforce by definition is a short-term specific purpose intervention designed to accomplish a time-limited task, usually lasting a few months to a year. A Taskforce is entirely unfit for the purpose of resolving deep-rooted structural deficiencies and inequalities, and providing for the strategic policy direction which Government must follow over the coming three decades. The Committee Report further recommends that the task force utilise “existing structures” which fallaciously implies that existing structures are already fit for purpose. They are not.

Regarding the imminent scaling down of peat fired electricity in the Midlands, the Committee heard compelling evidence³ of the entirely overstated and misrepresented reporting in the media of the redundancy offering made to workers, when, in fact, they have been offered nothing more than a minimum statutory offering. This was an example of how the corporate body manages media messages and gets to press, before the workers have even been notified.

For some people, justice is a core moral value that ought to be pursued for its own sake. For others, justice is largely an issue of political expediency. From the latter perspective, justice is important only to the extent that states with different interests see a global deal as ‘fair enough’ to enable them to present it to their domestic publics.

³ https://www.oireachtas.ie/en/debates/debate/joint_committee_on_climate_action/2018-12-04/2/

Sinn Féin Proposition

Transformative justice requires legislative change and a regulatory framework which creates the optimum conditions to obligate change from employers and the State, whilst protecting individuals and communities.

We need to anchor the *Just Transition* in demands for a deep, transformative change that will lead to dramatically different forms of production and consumption. Partnerships and voluntary commitments are not a substitute for Government responsibilities. It is abundantly clear that the Majority Report's de-carbonized or low-carbon approach will simply reproduce current relations of economic and social power and inequality. This is because its approach springs from a neoliberal framing of work, ownership, investment, growth and sustainability.

High Level Recommendation

That the Government put in place mechanisms to develop a national legislative, policy and regulatory framework for a Just Transition⁴. This framework must be constructed in 2019 for inclusion in the final version of the **National Energy and Climate Plan 2021-2030** due for submission to the European Commission By December 2019.

Subsidiary Recommendations

In exercising its functions, the framework should provide for *inter alia*:

- a) National, regional, and sectoral adaptation plans to prepare workers, enterprises, and the wider community for adaptive change;
- b) Prioritised and stimulated ethical investment in low-emission, job-rich sectors and technologies in localities and sectors most affected by, or vulnerable to, change;
- c) Mechanisms for meaningful dialogue and enforceable agreements between investors, employers, workers, advocacy groups, and non-profit community organisations;
- d) Compelled Transitional Justice Impact Assessments of both public climate policies and private industry initiatives;
- e) Training and skills development, which are key to support the deployment of new technologies and foster industrial change;
- f) Social protection, along with active labour market policies; and a dedicated advocacy agent (which might for example be housed within the Citizens Information Service);
- g) Local economic diversification plans that support decent work and provide community stability in the transition. Communities should not be left on their own to manage the impacts of the transition as this will not lead to a fair distribution of costs and benefits;

⁴ International Labour Organisation (ILO) Guidelines for a Just Transition *Towards Environmentally Sustainable Economies and Societies for All*.
https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=2ahUKEwjj3Jacr5PhAhXWWWhUIHUhCdSIQFjAAegQIARAC&url=https%3A%2F%2Fwww.ilo.org%2Fwcmsp5%2Fgroups%2Fpublic%2F---ed_emp%2F---emp_ent%2Fdocuments%2Fpublication%2Fwcms_432859.pdf&usg=AOvVaw1ITOd-fWB2exVsbsbXHYnE9X

- h) Equality Impact Assessments which differentiate impacts of transition on protected categories of people and;
- i) Rural & Peripheral Impact Assessments which differentiate the impact of transition on rural and island communities.

Chapter 3: Citizen and Community Engagement

Sinn Féin recognises the importance of community engagement in tackling climate change. We support the recommendation regarding the establishment of a Strategic Policy Committee (SPC) in each Local Authority, as well as other local supports for communities.

Much of the content and substance of this chapter of the report is dealt with elsewhere in this Minority report. The two recommendations of the Citizen's Assembly on micro-generation and community ownership as well as other Sinn Féin recommendations regarding community engagement in energy generation are dealt with in the Energy chapter of this report.

Similarly, the ancillary recommendation on public information is dealt with in the Education and Communications chapter.

One considerable oversight by the Committee is the absence of a role for the arts in raising awareness and consciousness on the issue.

Arts and Culture

Arts and culture is widely understood, appreciated, and regarded in its contribution to responding to the environment. Human interaction with the arts, both actively and passively, can prompt deep changes in how the public perceives concepts and issues. This presents enormous opportunity to influence public attitudes and behaviour towards climate action. Public, community, and participatory arts initiatives have a particularly important role to play in understanding sustainable utility of our resources and in the process of engaging citizens in consciousness-raising. This should be harnessed, incentivised, and encouraged to facilitate artists as key influencers and collaborators in our local communities both as well as at nationally and international level.

For centuries, reaching back to pre-historic times, artists have captured landscape transformation in their work. Engagement of artists in climate change transformations has increased considerably in recent years. Books such as *This Changes Everything* by Naomi Klein have changed public discourse on issues such as rising ocean levels and global temperature increase. Human induced climate change is a rich source of inspiration for artistic creation and a valuable medium for citizen engagement in its expression.

High Level Recommendation

Sinn Féin supports the integration of the artistic community into initiatives at local and national level to raise awareness and encourage action and activism on climate and environmental issues.

That by December 2020 the Department of Arts, Culture and Heritage develop a five year strategy which anchors Climate Action as a priority cultural theme and anchors it both in its outworkings and in its governance.

Subsidiary Recommendations

- a) Sinn Féin supports the appointment of an artist in resident in each local authority, who will have among their responsibilities, the duty to raise awareness of climate change within their local authority, and to work with the new SPC to this effect;
- b) Allocation of dedicated resources for Artists in the Community exploring themes of Climate Change and Sustainable Development;
- c) Allocation of funding under the Percent for Arts Scheme dedicated to public works on the theme of Climate Change;
- d) That in 2019 the Dept of Arts, Culture and Heritage establish protocols for Environmental Reporting of Arts Council and Heritage Council funded Agreements with third party beneficiaries

Chapter 4: Education & Communication

Public awareness and support for actions designed to combat climate change are crucial to tackling the problem. The science on climate change is clear and unambiguous and there exists considerable consensus regarding the extent of the problem and critical indicators.

Being a ‘laggard’ offers Ireland the benefit of the experimentation of other states, to learn from the failures and successes of others. Global experiences of Governments and communities worldwide, and the transformative changes which lie ahead for Irish citizens, must be framed within the protocols of a fair, objective, and impartial media. In the cultural context of a rapidly expanding unregulated online media environment, this presents many challenges for policy makers, governing bodies, and citizens.

Sinn Féin is concerned at the reference in the Majority Report to “examples nationally and internationally where, when efforts at communication have been inadequate, broad resistance has accrued to changes imposed upon communities.” This appears to imply that opposition to Government policy is based on ignorance and since the publication of the ‘leaked Draft Report’ many attempts have been made, at least in part, to draw parallels between critique of climate action measures and the water charges debacle.

We would suggest this forms part of the consideration of the establishment parties towards recommendations contained elsewhere in the Majority Report for punitive and regressive Carbon Tax increases. A distinction must be drawn between factual information and political propaganda being delivered to enforce a particular policy choice on the electorate.

There are references in the Majority Report regarding requirements for expertise from outside of Ireland to assist with certain issues. While the immediacy of the problem requires such external assistance, we must begin building the necessary expertise domestically to tackle these problems through the creation of relevant courses in third level and other relevant institutions.

The Citizens’ Assembly

AR1: Greater emphasis should be placed on providing positive information to the public which encourages people to make changes to the aspects of their behaviour which impact on climate change. Such information should be targeted at all age groups using a wide variety of formats. The information provided should be focused on highlighting the economic, social, health and other benefits of taking action rather than focusing on the negatives associated with a failure to act

Sinn Féin agrees with this ancillary recommendation. However, we are conscious that individual behaviour is only small aspect of a much broader scale of responsibility. The focus on the responsibility of individuals cannot be a smokescreen that allows for shifting the burden of responsibility from the large, corporate carbon emitters onto the backs of citizens.

Any communications strategy aimed at citizens must include a call to activism and advocacy on the issues of climate change. Citizens must be empowered with the knowledge and tools to hold the economic elites and those holding political power to account.

Limitations of the Majority Report

Sinn Féin supports the recommendations of the Majority Report, noting however the contradictions between the objectives put and the actions of the Government, particularly in relation to the recommendation on a review of the school curriculum, given their cutting of geography as a core junior cert subject.

Sinn Féin also supports the recommendation of public information campaigns, but in reality, it should not have to be a recommendation in such a report for such an obvious matter to be resolved. Sinn Féin will support genuine efforts to further initiatives in this area and guard against the cynical misuse of such plans to politically promote the Government itself, or parties thereof, as has happened recently with the National Development Plan. The Climate Action Council should be equipped to independently challenge any such abuses of the public money for narrow political purposes.

While touched upon within the commentary, Sinn Féin would be of the view that media should not seek to achieve a false sense of ‘balance’ on the issue of climate change as it is a matter of scientific fact. Recent ‘debates’ on the issue on RTÉ with certain TDs have been unhelpful. Focus should instead be focussed on vigorous debate on how to tackle the issue itself.

Sinn Féin supports the ring fencing of a proportion of coverage for all broadcast licence holders, with even greater requirements on those in receipt of public funding via the licence fee.

A number of large corporations involved in fossil fuel extraction regularly run advertising on broadcast and other media, usually highlighting other aspects of their business. This is a cynical ploy to increase brand recognition and should be stopped.

Advertising standards must also be enhanced to ensure companies are not allowed to ‘greenwash’ their products and services. The public need to be aware of the real environmental records of corporations, and not allow advertising budgets be used to spin a false narrative.

High Level Recommendation

That accurate information, adequately communicated is vital to progress on climate action. The scientific realities should be clearly stated and the rationale for headline targets and strategies should be made clear to all. However, healthy and vigorous debate should be encouraged on how these targets and objectives should be reached. Only through such informed debate will there be proper and substantial public engagement with this issue.

Subsidiary Recommendations

- a) The Department of Education and skills should immediately reverse the decision to remove geography as a core subject in the Junior Cert cycle;

- b) A ban on advertising by companies whose primary business is in the extraction and use of fossil fuels;
- c) Ensure the Climate Action Council has authority to prevent abuse of public funds for political purposes under the guise of public information on climate change;
- d) Strengthen advertising standards to avoid 'greenwashing';
- e) Provide for the education and training of relevant and emerging professions in Ireland and reduce dependent on expertise from outside the country.

Chapter 5: Unlocking Potential

The market and unregulated capitalism has created global warming with some sectors significantly greater polluters than others. Whilst the private sector itself will also play a role in the solution, the State itself must not outsource its obligations to commercial interests over the public good.

There are indeed great opportunities for well-paying jobs and for Ireland to improve its capacity in R&D, but it is vital that Exchequer funds be prioritised for state and semi-state sectors and that it becomes a shareholder in all publicly subsidised innovation.

It is incumbent on the State to ensure that the citizen is a shareholder and beneficiary of all publicly funded innovation so that advancement in climate change solutions are harnessed for the benefit of the whole of society. There are many examples globally of spectacular market failures and ongoing discourse amongst scientists and engineers of the merits and limitations of new technologies.

Ireland's ethical interest must extend beyond its shores throughout the entire supply chain to ensure that technological solutions are not developed to the cost of others elsewhere. Sustainable development goals and extended responsibility must be anchored in our Research and Development objectives, with the public interest at its core.

Ireland has an opportunity to make up lost ground by leading out on how we contribute to environmental reparation and placing research and development technologies in the public domain can contribute significantly to a transformative shift in scaling and distributing benefits. Failure to place public benefit at the heart of our R&D investment will simply fuel emerging 'disaster capitalism' trends which will eventually lead to an inevitable green capitalism market crash. Indeed, the Government and Fine Gael MEPs recently supported the 'innovation principle' within the EU's Horizon Europe R&D fund which inserted competition at the heart of the programme over the public good.

Combating climate change must not become the new frontier for the enrichment of the economic and intellectual elite. Transitional justice demands that we do not reward those who profited most in the creation of the problem. Climate action presents many opportunities for economic and social justice which must be secured to rebalance wealth creation and distribution in favour of the majority of citizens in Ireland and across the globe.

Benefits to our health from climate action

Sinn Féin believe we need to radically reduce people's exposure to pollutants through: planting trees and green spaces to trap heavy metals and larger particulate matter; planning airflow through the urban canopy to help disperse air pollutants from high footfall areas; implementing traffic reduction methods (e.g. low-emission zones, rerouting heavy traffic, and facilitating active transport); and relocating or rezoning heavy industry from densely populated urban areas. We also propose that local authorities should sponsor air

quality apps so that citizens can be actively involved in monitoring air quality, and hold those responsible for cutting air pollution to account.

An increase in green spaces is also known to have a positive impact on our mental wellbeing. A key factor in maintaining positive wellbeing is reducing levels of stress. Research has identified that visible connections with nature have a positive effect on an individuals reported stress. A review of numerous studies looking at the effects of different landscapes on health found that natural landscapes had a more positive effect compared to urban landscapes.

Leadership in international development

We are not the leader on climate action internationally that we should be. This will remain the case until Ireland makes progress on domestic action. We need to lead on this issue internationally through our domestic actions.

One area of particular concern is increased attacks on activists and community leaders who are protesting environmental degradation. Irish-based NGO Frontline Defenders said that 321 Human Rights Defenders were killed in 2018 ,making it the most deadly year on record for human rights activists. 77% of those killed were defending environment rights.

Limitations of the Majority Report

Like much of the report, there is little to object to in the recommendations of the Majority Report as written. They are so broad that differing interpretations can be made – and we know how the establishment will interpret it, in their own interests.

Sinn Féin supports substantial R&D investments by the State, subject to the conditions laid out previously. Climate change is not a natural disaster – it is a human-made. Constant pursuit of profit has played, and continues to play, a major part in the climate crisis. It is time for climate justice now.

Sinn Féin Proposition

Where investment is warranted in the private sector, priority should be given to social enterprises and companies with progressive ownership models such as cooperatives and community owned enterprises.

While investments may be justified, on occasion, to private, for-profit firms, there must be strict conditions attached relating to the future ownership and use of any technologies developed using state funds, and in terms of job creation arising from such developments

State investment in R&D should be prioritised for state and semi-state companies and agencies, and public third level institutions. This would maximise the ability of the State to own, exploit and use new technologies for the common good, both in Ireland and globally, rather than them being exploited for profit.

Where investment in private firms is justified, priority should be given to social enterprises and companies with progressive ownership models, and that the secondary benefits of any such investments, such as job creation, be targeted at areas of most economic and social need.

The state must be beneficiary of new technologies it funds the research for, and jobs must be created in those areas of most need, not where it is convenient for a multinational to site itself.

If such controls are not put in place, potential game changing technologies and advancements, part paid for by Irish tax payers, will be subject to patents and copyright. Much like R&D supports for the pharmaceutical industry, we will be forced to pay on the double, with life and death consequences

High Level Recommendation

That, in seeking to take advantage of the opportunities presented by tackling climate change, the public good be the primary consideration.

Subsidiary Recommendations

- a) That priority be given to R&D investment in public bodies, state and semi-state companies, and public third level institutions over private, for-profit companies;
- b) That where R&D investments are made in private companies, those companies with progressive ownership models be prioritised, and that measures are taken to ensure the public good is secured over any innovations and that their impact is not curtailed profit considerations;
- c) That the Government makes protecting environmental defenders a core part of its international work on climate action and that it ensures the supply chains of Irish companies and semi-states are free from environment degradation and human rights compliant.

Chapter 6: Financing Climate Action

Undoubtedly, the issue of carbon tax increases represents the most significant point of divergence between Sinn Féin and other political parties on the proposed remedies for carbon abatement. The divergence is substantial and rooted in considerable evidence that Carbon Taxes do not reduce emissions.

Financing Climate Action is a serious fiscal responsibility and political decisions cannot be compromised to indulge populist notions for quick fix remedies. Carbon taxation is one of the many market based 'command and control' instruments deployed by policy makers. Each one should be evidenced based to ascertain its environmental impact, cost-effectiveness, and distributional equity.

Carbon Taxes

Carbon taxation does not reduce carbon emissions. Carbon tax generates taxes. Since the introduction of Carbon Tax in the State in 2010, at €15 per tonne of CO₂ emissions by the Fianna Fail/Green Party coalition; and the subsequent increase in 2013 to €20 per tonne of CO₂ emissions by the Fine Gael/Labour coalition, emissions have increased. The exception was 2017 when GHG emissions fell, a reduction the Environmental Protection Agency (EPA) attributed to the exceptionally clement weather that year.

Last year alone, the Carbon Tax generated €440million in revenues all of which went into exchequer funds. This revenue is not designated or ring-fenced in any manner for climate mitigation measures. In fact, Fine Gael is on record for many years stating unequivocally that they do not support the hypothecation (ring fencing) of taxes to offset the harm caused by its source. This was recently borne out in efforts to have the sugar tax ring-fenced for health measures.

The *Fee and Dividend* carbon tax model as set out as an option in Majority Report will not raise any additional revenue for the State, and in fact will incur an additional cost in administering the scheme. Furthermore, and not insignificantly, the Minister for Finance will now have a shortfall in annual Exchequer Revenue as the previously retained finances would be returned as a 'dividend'.

It is important to note that this is not in fact a refund of the tax you have paid, but a flat rate payment which views each person as an equal 'shareholder' receiving the same 'dividend'. High consumers (and thereby high carbon tax payers) will receive the same dividend as a low consumer, who perhaps may be someone who has already been able to afford to invest in expensive deep home retrofitting.

It is also worth mentioning that the fossil fuel industry, including such petrochemical giants as BP and ExxonMobil, have put millions of dollars into promoting carbon tax and dividend systems.

Needless to say, whichever model is considered for the proposed increases, the punitive effect will fall most heavily on the poor and low income households, and disproportionately in rural areas. It is a form of austerity over investment.

Numerous studies analysing carbon-tax have all come to the same conclusions:

- a) It is a regressive tax which disproportionately harms lower-income households.
- b) There is no evidence that it reduces carbon emissions
- c) It fails to address other Green House Gas emissions such as nitrous oxide
- d) It incentivises gas, particularly fracked gas, locking us into long term gas infrastructure

Impact on Households

Studies undertaken by the ESRI in 2008 and again in 2018 state quite categorically that universal Carbon Tax disproportionately harms lower income households. This evidence is also borne out in studies in Norway and British Columbia. Norway imposed a carbon tax in 1991, but by 2008, Greenhouse gas emissions had grown by 15%. Whilst British Columbia is often cited by proponents of Carbon Tax, the evidence shows that residential GHG emissions have remained static and energy poverty has increased. Indeed, since the introduction of SMART metering in 2012 in BC, the number of winter disconnections has risen from 4,000 per annum to 30,000 per annum of which 15% were left without electricity for more than 7 days.

It is estimated that around 400,000 households in this State suffer from fuel poverty. To tackle this problem, we must address rising energy costs and the energy efficiency of homes in innovative, practical and sensible ways. No single measure will combat fuel poverty. So, we need a whole of Government approach to ensure that we end the scandal of citizens going cold in their homes.

Polluter Pays Principle

Carbon Tax is oppositional or contrary to the *Polluter Pays Principle* in that it shifts responsibility for pollution from the producer to the citizen. It fails to achieve the *extended producer responsibility* (EPR) which shifts the responsibility of dealing with pollution from governments (and thus, taxpayers and society at large) to the entities producing it. In effect, EPR internalises the cost of pollution into the cost of the product compelling primary suppliers and producers to move to sustainable alternatives.

Why Carbon Tax Cannot Change Behaviour

Home energy consumption is inelastic; in other words, there is an optimum amount of heat which humans need for comfort and very little difference between that and the minimum needed for survival. With no alternative other than to live in colder homes, there is no means by which the majority of dwellers can reduce consumption and absolutely no alternative for those who are already on minimal consumption.

- Householders are **currently paying €52.67** on a tonne of coal (25bags) this will increase to a **tax of €208** on 25 bags of coal under proposed measures with

absolutely NO evidence that this will in any way mitigate our emissions. Currently **all of this Revenue** goes to general exchequer expenditure and the Government claim it cannot, by law, be ring-fenced for environmental abatement measures.

- Carbon tax is also subject to VAT:
 - Home heating at 13.5%
 - Petrol and Diesel at 23% as well as Excise Duty being charged
- Since 2010 home energy costs have increased by 24%. A higher burden falls upon rural domestic customers as they pay a higher Standing Charge than urban counterparts.
- Citizens are already contributing to renewable energy development through the PSO Levy

Efforts need to be directed toward businesses who sell fossil fuel home heating systems and fossil fuel powered vehicles. Those who stand to benefit most from fossil fuel consumption must be compelled to bring alternatives to householders. Industry must be obligated to increase the number of customers they have using renewable clean energy sources. This would mean a gas supplier, many of which also supply electricity, would encourage customers to switch to heat pumps; or car dealerships would direct customers toward electric vehicles.

Carbon taxes also encourage the flawed logic of lower carbon bridging fuels such as natural gas. This does not address the core problem and encourages investment by the fossil fuel industry in new forms of non-renewable carbon based fuels over others – capital which could have been spend on new forms of energy production that are genuinely carbon free and renewable.

PSO Levy

The Public Service Obligation Levy (PSO levy) is charged on every electricity bill, is designated to support renewable energy and generates almost €500 million per annum. Research cited by the ESRI found that “the cost of the PSO levy relative to income is 12 times larger for the households in the lowest income decile than for the average of the five wealthiest income deciles”. As the PSO component of households’ energy bills is expected to grow with the expansion of renewables, it should be restructured and made progressive. Options such as, for example, ‘**Incremental Block Pricing**’ were identified by ERSI and should be considered. **PSO reform** should also be made to ensure high energy users such as Data Centres, for example, contribute more.

VAT & Excise Duty

It is worth noting that all fuels are also subject to VAT and transport fuels are subject to a third tax – excise duty. Frequent increases in Excise Duty haven’t contributed to reducing consumption and thereby emissions and the changes in VAT haven’t contributed to reducing consumption and thereby emissions. Regardless of what title is given to the tax –

the outcome is the same: the price of the fuel increases but consumption does not decrease.

The Citizens' Assembly

The Citizens' Assembly were not presented with adequate or comparative data on Carbon Tax, nor were they presented with any comparative models of distribution. It is evident from their recommendation that they were of the view that ring-fencing (hypothecation) was possible. However, in the absence of a legal instrument providing for such, no such mechanism can in fact be put in place.

Limitations of the Majority Report

Throughout its deliberations, the Committee heard scant testimony on the subject of Carbon tax and absolutely no evidence was presented in support of a Fee and Dividend model. The burden of proof for abatement potential of a financial instrument falls upon the proposer. No such evidence has been presented to the Committee upon which to predicate proposals for increasing this taxation.

High Level Recommendation

That there be no increase in Carbon Tax and that the Government and other parties abandon their drive towards imposing another regressive tax on the Irish people.

Subsidiary Recommendations

- a) That the Government in 2019 introduce a Financial Instrument to ring-fence (hypothecate) and freeze the entire proceeds of the existing €20/Carbon Tonne price, where such price is sustained at the current rate until December 2022 at which time the efficacy of the hypothecation be reviewed;
- b) Place obligations on those who put fossil fuels on the market to encourage customers to renewable energy alternative;
- c) Policy and legislative changes to facilitate microgeneration for householders and businesses and to develop other sources of renewable energy such as offshore wind, solar, biogas and biomass;
- d) Use a combination of low cost loans and grants, green bonds to enable householders and businesses to switch to renewable power and to retrofit.

Chapter 7: Energy Security

Transitioning from fossil fuels for home energy, industry and transportation means increasing our demand for electricity, most of which is produced using fossil fuels. Our current rate of electricity consists of 30% produced from renewable sources and 70% from fossil fuels. Not only must we switch these ratios and go further again, but we must also plan for an increase in electricity consumption over the coming decade.

Displacing our reliance on fossil fuels with renewable energy will create a cleaner environment and enhance security of supply on the island of Ireland. The State has EU renewable energy targets and also targets in terms of heat and transport. Renewable electricity generation will be a key element in the transition from fossil fuels in these areas also, as homes switch to heat pumps and in transport switch to electric vehicles.

Achieving a Balanced Grid

We acknowledge the Majority Report highlighting the wide portfolio of energy sources we need into the future. Attaining a low carbon secure energy supply is a significant challenge for Ireland and we need to consider the mix we need. This requires getting the correct balance between intermittent and on-demand sources of energy. We must develop indigenous reliable sources of electricity production and energy storage that creates this balance. Intermittent sources of energy alone will not displace fossil fuels. The all-island Single Electricity Market will form a crucial part of our strategy in building renewable energy sources.

Intermittent energy sources

These are sources such as wind and solar and are not continuously available for conversion to energy. The limitations of intermittent energy sources are self-evident; one cannot turn it on when needed and it can go to waste if it is produced during times of low demand.

On-demand energy sources

These refer to those energy sources that can generate power at any time and therefore can be synced with demand. In our current energy mix, coal, peat, and gas in particular are performing this function. We cannot displace these fossil fuels by relying on intermittent sources alone, we need to develop biogas, biomass, storage, and hydroelectric power.

Our Energy Future

Sinn Féin believe we must instead prioritise investment in the achievement and delivery of a wide portfolio of balanced energy sources, including a much greater emphasis on off-shore wind and sustainable on-demand power sources such as biogas and, to a lesser extent, biomass for electricity production as well as emerging storage technology.

Consideration should be given to converting existing fossil fuel based electricity generation plants which are currently approaching the end of their useful lives over to indigenous

biogas and, to a lesser extent, biomass or to constructing new plants instead along with carbon capture technology. We need also to progress interconnection capacity, such as the 'Celtic' interconnector with France.

With the essential balanced mix of on-demand and intermittent sources, renewable electricity could increase to 80% of our energy mix by 2030, with 58% of our energy coming from intermittent sources. The rest will be from on-demand sources such as biogas, biomass, and storage. The potential in microgeneration, although difficult to fully quantify with self-consumption, battery back-up, and supply to the grid, will also form an important part of the energy mix going forward.

We need to develop policy alongside the changes in technology and the price of technology which has been recently evidenced in Britain where costs dropped dramatically in the auctions for offshore wind. Ireland should learn lessons from countries like Scotland, which simplified planning approval processes for offshore projects by introducing a single consent body, and Denmark, which has invested public money, through the State owned grid operator, in building infrastructure out to the offshore wind turbines.

Hydroelectric power is a renewable energy source that can complement intermittent sources by providing on demand power. While there may be geographic barriers to the development of further largescale plants the feasibility of this should be examined there is certainly scope for small scale hydroelectricity to be developed across many locations on the island.

Energy Storage

Storage technologies will allow us to capture energy from intermittent sources that would otherwise go to waste. Storage technologies are constantly developing and can take different forms including battery, pumped, compressed air and flywheel technology storage, as well as the possible potential in hydrogen gas from renewables.

Microgeneration and Community Ownership

The Oireachtas Committee Report outlines the importance of microgeneration as well as community ownership of renewable energy projects and biogas co-operatives. Alongside this, the creation of 'microgrids', or bringing the generation of power closer to where it is used, reduces losses and emissions.

Limitations of the Majority Report

While the Committee report highlights the particular wide portfolio of sources of energy needed by the State, it fails to recognise the balance in terms of on-demand power needed to displace fossil fuels.

High Level Recommendation

We need to outline a clear energy mix of the different technology types needed for our electricity generation in the coming years and this must ensure a balance of on-demand and intermittent sources. Electricity will be a key source of energy into our future for both

heat and transport. This will also be a job creator and aid in reducing agricultural emissions and transport emissions.

Subsidiary Recommendations

- a) Develop on-demand renewable energy sources such as biogas, biomass, storage technology and hydroelectric to complement intermittent sources. These need to be prioritized;
- b) Large investment in the grid is needed to deal with small scale renewables as well as dealing with the switch to electric vehicles and heat pumps;
- c) Reform planning processes to provide greater certainty for security of supply and potential investors including the establishment of a single planning body for the approval of offshore applications;
- d) Alternative sources of renewable fuel for heavy vehicles need to be developed. This includes CNG from biogas.

Chapter 8: Agriculture, Forestry & Peatlands

Whilst agriculture, as Ireland's biggest industry, is often cited as the country's most prolific emitter of greenhouse gases, it also provides the most workable opportunities for reducing carbon emissions and providing alternatives to fossil fuels for energy production. Meanwhile, in comparison with other polluters such as transport, in a European context, Irish agriculture is a good ecological performer.

Sinn Féin recognises that the Committee made efforts to reconcile the economic sensitivity of the challenges facing farmers and land custodians against the need to reduce emissions and, in this regard, the recommendations of the Majority Report are in the main both beneficial and uncontentious. However, during the process, it also became apparent that there were points of divergence which limited the scope of the measures and, in some instances, entirely disregarded constructive proposals submitted to the Committee by farming organisations. This Report attempts to capture some of the misdirection and omissions.

While many discussions may be had regarding agriculture, the environment and climate change, it is worthy of note that the Paris Agreement and the European Union assert that "Food production must not be threatened when addressing climate challenge".

The Citizens' Assembly

The Citizens' Assembly *Recommendation 11* proposed there should be a tax on GHG emissions from agriculture despite having heard from Professor Alan Matthews of TCD that "no country in the world has yet included agricultural emissions within an emissions regime". The Assembly did however note in *Ancillary Recommendation 3* that the agriculture sector in Ireland requires ongoing support to make a transition to lowering GHG emissions, and that cognisance must be taken of the impact which the sector has on the economy, particularly the rural economy.

Sinn Féin supports the Assembly recommendation to reward farmers for land management actions that sequester carbon, whilst recognising that instruments are not available to measure this on a farm-by-farm basis. The Majority Report goes some way on the sequestration measures but falls short on potential. It must also be noted that farmers currently pay the existing carbon tax and proportionally contribute significantly to this Government income stream.

Sinn Féin further notes the recommendations to measure, report, and reduce food waste, which is currently calculated as approximately 30% of all food produced. Given the presentation from Foodcloud to the Assembly, Sinn Féin understands this term to primarily mean *Food Surplus* rather than *Food Waste*.

Sinn Féin notes the provisions of *Recommendation 13* to 'review and revise' supports for land use diversification, with attention to supports for planting forests; and is concerned that the Majority Report fails to adequately adopt the 'review and revise' objectives of the recommendation.

It is evident that the recommendations of the Citizens' Assembly are well intentioned, albeit confined by the limited time the members had to gain a deeper understanding of the complexities proposed. Of greater concern is that the Committee, who had significant opportunity and resources for deeper examination, failed in its obligation to harness the potential for mitigation in its Majority Report and Sinn Féin efforts to guide some policy recommendations were significantly obstructed.

Limitations of the Majority Report

Significantly, the Majority Report failed to respond adequately to the diversity of farming activity, varying scales of production and size of holding, and differentiated land types. These variances often give rise to competing interests in the agriculture sector and the Majority Report failed to safeguard against interventions which could contribute to deepening wealth inequality amongst farmers. The Report also failed to adequately address past green agriculture schemes into which farmers invested but incurred losses because of Government policy failures. Many lessons can be learned from these failures to avoid repeating similar mistakes in the future, however the Majority Report failed in its obligation to direct Government adequately in this regard.

Afforestation Policy

Sinn Féin has grave concerns regarding future afforestation policy given the documented failures of the past.⁵ Whilst investment in fast growing conifers has proven commercially profitable such planting has limited if any impact on carbon sequestration⁶. It is acknowledged that intensive plantation of invasive⁷ species such as Sitka Spruce, has had a detrimental environmental and ecological impact, and recent studies show that such planting in fact contributes to global warming⁸. Coniferous monoculture also impacts negatively on the biodiversity of local habitats and in some counties⁹ has been a force for displacement of people, and de-population¹⁰ of some rural communities. Desertification from clear-felling has also contributed to degradation of topsoil and pollution of watercourses¹¹ which effects (amongst others) fish stock.

Government policy in the past has substantially incentivised this type of planation over broadleaf planting, which has led to largescale land grabs in some counties for commercial

⁵ Irish Natura & Hill Farmers Association: Submission to JCCA 12th Dec 2018; Pages 2, 4 and 5

⁶ Prof John Sweeney, Coillte Conference 2016: <https://www.irishtimes.com/news/environment/planting-trees-is-good-for-the-environment-right-1.2575489?fbclid=IwAR1mOhXI9SaBiNc7rS98h0WF5CnluOIM5xin9SY3a7ABV3siQfcXKqDYIRw>

⁷ Classified as invasive in many countries and blacklisted in Norway

⁸ Kim Naudts et al, 2016: *Europe's forest management did not mitigate climate warming* - <http://science.sciencemag.org/content/351/6273/597>

⁹ Leitrim County Council: <https://www.independent.ie/business/farming/forestry-enviro/leitrim-councillors-move-to-curb-the-level-of-afforestation-in-the-county-36675683.html>

¹⁰ Various Leitrim; Laois, Offaly, Wicklow: <https://www.irishtimes.com/news/environment/afforestation-a-source-of-environmental-damage-and-depopulation-1.3776391>

¹¹ Agriland/Irish Wildlife Trust: <https://www.agriland.ie/farming-news/irish-wildlife-trust-plantation-forestry-is-a-disaster/>

high yield wood production, at the cost of both the environment and of food production. Many of these commercial forestry reserves are not locally owned, many having become offshore Hedge or Pension fund investments, whilst others have been purchased as offsets by carbon intensive polluters. This type of planation has had a regressive economic, social and environmental impact and some counties such as Leitrim, Wicklow, Laois and Offaly have been particularly adversely affected.

Short Rotation Biomass Crop Production

The Report failed to document the divergent opinion on biomass and the absence of a clear strategy. It acknowledges that imported biomass is neither a desirable nor a sustainable solution for electricity production, and that Ireland must develop an indigenous biomass supply, but it failed however to provide a pathway for development.

Sinn Féin fully recognises the limited potential for biomass in the electricity production mix and sounds a caution with regard to fast-growing timber. The potential, however, for the production of short rotation crops such as willow and miscanthus have been substantially undeveloped in the Majority Report. To be commercially viable, these crops must be grown within a 50-60 miles radius of a bio-energy market outlet.

In 2007, the Department of Agriculture rolled out a pilot Scheme¹² to stimulate the production of miscanthus and, after a popular response, in 2011 the Scheme was mainstreamed. The Majority Report fails to address the policy failures which led to the collapse of the Scheme.¹³

Whilst agriculturally viable and technically feasible as source of energy, Government failed to create a scheme for local biomass heat generation which effectively left the farmer with a fruitful crop but no market outlets. This scheme failure cost both the taxpayer and the farmer millions of euro in losses and cost the State an opportunity to reduce reliance on fossil fuels. In order to advance the island's security of energy supply, alternative income for farmers and achieve our emissions targets, future costly policy mistakes must be prevented.

Hedgerows & Habitats

The potential contribution of hedgerows to carbon sequestration storage was duly noted in the Majority Report. However, it failed to address both the success and failures of the popular Glás initiative, which achieved its hedgerow plantation objective ahead of target. Despite the enthusiastic response from farmers, the Department of Agriculture failed to ensure that adequate nursery stocks were available to meet the demand and suppliers ran out of stock. Despite there being an obvious demand from farmers for a subsequent tranche, the Minister failed to roll-out a further phase, as exceeding targets was not a

¹²<https://www.agriculture.gov.ie/publications/2011/annualreviewandoutlookforagriculturefisheriesandfood20102011/environment/energycrops/>

¹³ <https://www.independent.ie/business/farming/promised-market-for-miscanthus-crop-fails-to-emerge-29783160.html>

projected outcome. This exemplifies the failure of Government policy to respond to popular mitigation measures within a sector oft criticised for its emissions.

Notwithstanding the success of the Scheme, Sinn Féin also acknowledges that the full extent of the carbon sequestration and storage value of hedgerows has not been quantified in Ireland and much also depends on their being maintained in a state favourable to conservation in order to optimise their potential. Sinn Féin made proposals in this regard for the preparation of a national strategy, which was rejected.

Sinn Féin also recognises that climate change is anticipated to affect all levels of biodiversity, from organism to biome levels. Both birds and bees are indicators of the health of the environment and conservationists indicate increasing concern for at-risk bird species. It is also noted that one-third of Ireland's wild bee species are threatened with extinction. This habitat loss and degradation is caused by human activities and climate actions which also protect and restore habitats will provide valuable co-benefits for threatened wildlife.

Brexit

Sinn Féin recognises the imminent uncertainty and potential threat that Brexit presents to future CAP initiatives, and the complexities that may arise in the event that agricultural practice in the north of Ireland deviate from Common Rules. The Majority Report fails to address this issue.

Sinn Féin Proposition

Hedgerow Expansion and Development

Sinn Féin proposes to expand the width of farm hedges and plant mixed rows of new sustainable trees along each hedge. These will more than double the carbon sequestration area on the farm. Additional timber production will serve as a carbon store; create future income for the farmer; and enhance the natural habitat and bio diversity of the farm. Hedgerows and adjoining forest rows must be included in the area allowed in the Basic Farm Payment under CAP Pillar 1. As an additional part of the Afforestation Programme, the farmer must be compensated with a Forestry Payment at a rate per 1000 trees, as an additional part of the afforestation programme.

As well as acting as a boundary and serving to enclose livestock in fields, hedgerows act as an important factor in the habitat of various animals and plants. Bee hives should be deemed as *livestock units* for the purposes of CAP payments. This would have the effect of supporting bees and conserving their role in pollination and the hedgerow expansion programme would accommodate this. It is clear that farmers must be a partner in mitigating the decline of the bee population and subsequent ecological consequences. Whilst Apiculture (the keeping of bees) is provided for in CAP, Ireland has no formal programme for bee- keeping.

Sinn Féin further supports the completion of a national hedgerow inventory to quantify the sequestration value of hedgerows, in order to better inform policy makers.

Soil Nutrition Solutions through Lower Emission Fertilisation

The use of injection equipment for slurry application on land is vital to reducing the leakage of high levels of ammonia and other harmful gases and phasing out the spreading of slurry. The purchase of this equipment needs to be supported and made accessible to all farmers. The use of chemical fertilisers, especially nitrogen, needs to be managed better and reduced as much as feasible. Fertiliser as the bi-product of Bio-Digestion should replace chemical fertilisers and become a central part of the lower impact soil nutrition model.

Farming and Active Management of Environmentally Sensitive Areas

The over-grassing, and indeed under-grassing, of mountain commonage and upland farms causes issues for carbon storage and the protection of bio-diversity in these natural habitats. Peatlands, floodplains, and mountain areas are important carbon stores and structured farm practices, based on the Burren Farming Conservation Programme model, should be replicated across these areas. Incentives must be put in place to organise and reward the farmers who maintain these lands, which are also important carbon stores.

When harvesting stops on peatlands, and Bord na Móna move from this industry, alongside the restoration of these bogs in terms of carbon sinks, analyses must be conducted on the use of marginal lands for biomass production.

Organic Farming and Marketing Supports

Organic farming must be supported, not only with adequate advice and incentivisation, but also with the appropriate marketing of produce. The promotion of our clean, organic product to a market which can afford and is willing to pay a price commensurate with the quality and unique nature of Irish organic produce in a European context is vital. Many farmers would consider the transition to organic production if the supports were better and prices for the end-product enhanced.

Energy Production: Rooftop Solar, Biogas and Biomass

Renewable energy development offers sources of income for farmers. Biogas and biomass are discussed elsewhere in this document. There is huge potential on every farm in the country to generate energy using photovoltaic solar power which would greatly off-set carbon emissions from the farm. Large agricultural sheds carry significant unharnessed surface areas. The installation should be encouraged with a scheme of part grant-aid coupled with co-funding options which may include part loan and part feed-in tariff offset. Such a scheme would have a triple effect of reducing on-farm energy costs; contributing renewable energy to the grid and a low maintenance, residual income to the farmer.

Supporting the development of new sectors in Irish agriculture

Many sectors of Irish agriculture which could be carbon positive are underdeveloped. A prime example is that of the sugar beet industry which should be re-established. The triple benefits include the carbon sequestration value of the broadleaf crop in cultivation, the food product value of the sugar and the fuel bi-product creation including bio-ethanol.

The production of industrial hemp also offers potential as well as the growing, processing and marketing of other crops for the pharmaceutical and cosmetic industries. The production of biogas via digesters which also consume great amounts of slurry and grass and this is further addressed in the energy chapter.

Conclusion

The long-term result of a number of these proposals would be to change of the Irish farming model to a lower intensity, higher farm profit and more ecologically beneficial one, which would be sustainable into the future. Many farmers would reduce animal stocking levels in these circumstances, while maintaining or increasing their income from the land.

High Level Recommendation

That Government, in association with the Department of Agriculture, the Department of Climate, Energy, and Communications, and other stakeholders, complete the development of a sustainable integrated strategy before March 31st 2020; which stimulates the production of both food and energy in the agri-sector, whilst balancing the need for food and energy security in equal measure.

Subsidiary Recommendations

Notwithstanding the broader scope of the strategy, it will make provision to:

- a) Undertake a thorough assessment to determine the agricultural, technical and economic viability and feasibility of short-rotation crop production for biomass and/or biofuel use and distribution, and to quantify its short, medium and long-term potential as a source of supply for power plant electricity generation and local heat generation centres;
- b) In the context of Brexit, to liaise with the Department of Agriculture, Environment and Rural Affairs in the North of Ireland, to establish co-operative strategies for abatement of GHG emissions and to mitigate any impact in the south from higher levels of airborne emissions north of the Border;
- c) The immediate discontinuation of financial inducements for monoculture afforestation, and the immediate introduction of grant schemes and tax incentives which favour the planting and maintenance of sustainable forestry and hedgerows;
- d) To undertake an immediate assessment of fertiliser, manure and slurry practices and identify opportunities for sourcing, supply and adaptation to more environmentally sustainable products and practices;
- e) To legislate for ecological assessments of all afforestation applications (outside of EU designated sites) to mitigate the loss of biodiversity-rich areas to forestry, and to protect ground nesting birds, pollinators and species rich grasslands;
- f) To complete the National Hedgerow Survey using LiDAR technology and develop a National Hedgerow Conservation Strategy to maximise the carbon and biodiversity co-benefits of Ireland's unique hedgerows;
- g) Sinn Féin supports an island wide solution to addressing climate challenge and that Department of Agriculture, Environment and Rural Affairs in the north and Department and Agriculture, Food and the Marine establish a joint working plan/group and work with all relevant stakeholders.

models in other countries with a view to adopting successful best-practice models in other countries, avoiding the pitfalls and failures of others, and centring the principle of Just Transition at the core of its deliberations²⁰.

Property Held in Trust

Unique to Ireland is the number of public service buildings which are held in trust to which the Government has no direct authority over. This includes 99% of our Primary Schools, 33% of Secondary schools, and a significant number of hospitals. The patronage system put these buildings beyond the reach of the State to compel to retrofitting, at least in the medium term. The Committee advanced no solutions as to how this significant barrier might be overcome

Limitation of the Report

The proposals and targets in the Majority Report are entirely towards mass retrofit of housing are greatly overstated, unattainable, and unsustainable in the short term. They can best be described as aspirational and can only be viewed as a long term measure with potential for tiny incremental gains over 30 to 40 years. In reality, the gains from current retrofit models, in particular deep-retrofit, over the next decade will be marginal and the best opportunity for change arises from new builds over the corresponding period.

More worrying are the number of recommendations in the Majority Report which are predicated on the assumption that there will be a wide scale demand for retrofitting. In addition to assumptions regarding emission reductions, there are also a number of recommendations which assume large employment potential and enough demand to legitimise the establishment of a support agency in every county.

There is a deficit of data available pertaining to the status of the existing national housing stock; the last report having been done in 2000 and is now outdated. This limits the substantiation of prescribed measures at this time. Contemporary data must be collated and an investigation of best practice models in other countries must be undertaken to best inform a strategy for CO₂ abatement in residential properties on a scale that will be transformative.

High Level Recommendations

The Department of Housing, Planning and Local Government must produce a plan with clear deadlines for the energy retrofitting of all residential dwellings. This plan should outline clear funding commitments and ambitious targets for the energy retro fit of both local authority and private dwellings.

Subsidiary Recommendations

- a) Increase investment in the deep retrofitting of all social housing stock held by local authorities and approved housing bodies;
- b) Expand range of SEAI grant measures to include double-glazing of single glazed buildings;
- c) Increase grant scales up to 100% for lowest income deciles with an incremental downward tiered scale to 50% for higher income deciles;

²⁰ <http://www.housingeurope.eu/resource-1096/decarbonisation-of-the-building-stock-a-two-front-battle>

- d) Weight all measures towards improving efficiencies from lowest G-Rated properties to achieve mid-range C-Rating;
- e) Introduce low interest Green Mortgages and low interest retrofit top-up options to existing mortgages;
- f) Examine the introduction of supports for Group purchasing schemes to enable collectives of householders to undertake certifiable self-retrofit initiatives to gain savings through bulk purchases and efficiencies of labour;
- g) Commission the:
 - i. ESRI to undertake new National Survey of Housing Quality by December 2021;
 - ii. CSO to quantify and correlate the tenure and solvency status of each dwelling in the State.

Chapter 10: Sustainable Transport

The Transport sector is Ireland's second largest source of GHG emissions. Transformative changes in modality represent the single greatest opportunity to reduce carbon and other noxious emissions, in the short to medium term. This will require the development of a sustainable intermodal transport strategy for urban cities and towns, and for rural areas.

The 2016 Census of Population Report shows 2.9 million people live in the aggregate urban areas and 1.8 million people live in the aggregate rural areas thus demonstrating the spatial complexity and variance of solutions required. Such a strategy will require consideration for the movement of people, goods and livestock for work, education, commercial purposes, and the mobility of people to undertake ordinary day-to-day personal and leisure activities.

Consideration must be given to how current modalities can be re-configured or replaced with more environmentally sustainable alternatives. Consideration must also be given as to how new modalities which harness new technology can be phased in and how previously used infrastructure can be revitalised or re-purposed for new uses.

The Majority Report acknowledges the significant challenge we face in reducing transport emissions, which account for 20% of our overall GHG emissions and significant growth in sectoral emissions which are expected to continue to rise. The Report further states that, if the Government implemented existing policies, such as the Smarter Travel policy, the situation would not have escalated to the point we are at today.

We argue that a key omission in sustainable transport planning has been the abandonment of a first-class public transport system, a policy which was not given top priority in the Report.

The Committee acknowledges that time did not permit engagement with all potential stakeholders and nor was there an opportunity to explore the range of new transport technologies which may be factored into rolling stock replacement. However, this is something which may be undertaken at a future date.

The Citizens' Assembly

Sinn Féin agrees with the intention of the recommendations of the Citizens Assembly including *Recommendation 8* featuring *bus lanes, cycling lanes and park and ride facilities*; and *Recommendation 9* supporting *the transition to electric vehicles*.

R.10: The State should prioritise the expansion of public transport spending over new road infrastructure spending at a ratio of no less than 2-to-1 to facilitate the broader availability and 3044 uptake of public transport options with attention to rural areas.

However, we do not endorse an arbitrary 2:1 ratio of Public Transport to Road investment as proposed in *Recommendation 10* as such metrics fail to allow Government to respond to the most pressing priority year-on-year. We do, however, support significant investment in public transport and view it as a priority solution to air pollution and transport emissions and a transition to public transport outside of our cities would undoubtedly contribute substantially to achieving our targets

Limitations of the Majority Report

Whilst the Majority Report acknowledged that the aggregated number of people across the country, commuting into and out of towns and cities to work and study, is greater than the numbers commuting into and out of Dublin, it failed to prioritise solutions for modal shift throughout the regions.

As a consequence of this, the Majority Report addresses two opposite ends of the scale; at the macro end, it provides for cities over 75,000, and at the micro level, it prioritises the Rural Transport Scheme (Local Link), which serves more a social inclusion purpose to people who do not drive than as an alternative to daily commuters. This leaves a gaping hole in proposals for regional transport, which, in effect, means high dependency car users across the country are not being prioritised for transition to public transport.

Alarmingly, the CSO data illustrates that 6 out of 10 children travel to primary school by car every day, whilst only 1 in 10 travels by bus. This demonstrates the scale of the challenges for the modal shift which lies ahead however the Majority Report does not address this deficit.

Sinn Féin Proposition

There is much in the Transport chapter of the Majority Report that is entirely agreeable, including the need to improve active travel methods, infrastructure, and accommodation for increases in electric vehicle use. We share the view that this requires a dramatic increased investment in public transport. Our major concern is around the prioritisation of those recommendations.

Sinn Féin has always called for significant increases in public transport as a method of emissions reductions, and we believe this should have been the main priority of the Committee report.

We appreciate that the Majority Report recommends that new public transport projects be prioritised under the NDP, however we caution that this must be done in conjunction with expansion of existing services, in particular rural bus routes, which present opportunity for immediate change unlike projects in Dublin which are currently only at planning stages.

We also have concerns about the lack of understanding of the challenges facing rural communities in accessing public transport. The recommendations in this regard are extremely weak. Furthermore, recommendations around the Rural Transport Programme, which is a very small programme designed for very local, demand-responsive travel, fail to make specific and clear recommendations around increased investment in Bus Éireann, which is the most important provider of rural transport in the state.

We also need to consider alternative freight transport sources such as rail and waterways for freight.

In Sinn Féin's 2019 Alternative Budget, we allocated a one year increase of 25% in PSO to improve service frequency and route coverage at Bus Éireann. We intend to allocate similar increases each year until the network is brought up to a level that would deem it to be fit for purpose.

Such large scale increases in funding are what is required if rural transport behaviours are to change. We also recommend a review of fares on trains and Bus Éireann services to encourage use of public transport in rural places.

We recommend significant increases in funding, in line with our own 2019 proposal, to bring the state in line with our European counterparts regarding PSO spend, and to ensure significant improvements in public transport provision as the primary method of reducing transport emissions. This will have other knock-on benefits around the rural economy, balanced regional development, social inclusion and increased mobility for older and disabled citizens

High Level Recommendation

- a) The Department of Transport, Tourism and Sport develop Sustainable Regional Inter-modal Transport Strategies to 2035, which incorporate the city transport strategies and connects them to towns in the regions with populations of 1500 or more. Such strategies should provide for a significant shift from private vehicle and road freight use, to intermodal solutions which include bus, rail, cycling, and waterway modalities. Each regional strategy should be completed for report to the Standing Committee no later than June 30th 2020;
- b) The Department of Transport, Tourism and Sport:
 - a. In association with the Department of Education and Skills, undertake a national baseline study of current School Transportation system which documents the current routes operated by Bus Eireann and associated sub-contractors; private coach and bus operators; and private vehicle subsidies (eg Gaelscoileanna). The study, which should capture route logistics, passenger journeys, capacity and operating costs, should be completed for report to the Standing Committee no later than Dec 31st 2019;
 - b. In association with Waterways Ireland, commission a survey for completion by March 31st 2020, of the inland waterways including the Shannon-Foynes Waterway, the Suck and Nore tributaries, and the canal infrastructure to document the accessibility, capacities and maritime limitations for barge freight haulage, and identify interconnectivity potential for intermodal freight transportation;
- c) Public transport investment is key in reducing transport emissions. Our population is due to increase by 1 million by 2050 and it is imperative that the state facilitates change to encourage people out of cars and into buses, trams and trains. The government has consistently underfunded the three CIÉ companies. Due to increases in employment and population in recent years public transport services on key routes are at capacity and existing services can't accommodate demand. The government must prioritise investment in rail, tram and bus services to ensure that public transport is available to all in our cities, and that it is the "go-to" method of commuting.

Subsidiary Recommendations

- a) Sinn Féin believes that the fastest, most efficient, and more practical measure we can introduce to reduce transport emissions is to address the significant deficits in existing public transport services, and to prioritise the improvements in state wide infrastructure as part of that process;
- b) The benefits of doing this will also address another major issue highlighted at the Committee, namely the challenges around transport in rural Ireland which have led to a huge over-reliance on cars;
- c) The poor state of rural transport options due to decades of underinvestment has led us to a place where there is now a rural transport crisis, evidenced by the lack of options for rural people which was laid bare in the aftermath of recent changes in road traffic law;
- d) People living in rural areas in many cases do not have a choice other than to drive. The solution to this is to increase investment in existing rural transport provision whilst ensuring that incentives exist to encourage behavioural change;
- e) Investment in the electricity grid to cater for a rise in electric vehicles;
- f) Encourage the development of CNG from indigenous biogas for the haulage industry.

Chapter 11: Waste Management

Waste in our society is a problem, both in terms of pollution and also in terms of our emissions. There is a considerable amount of fossil fuels used in the creation and disposal of waste, particularly plastics waste.

The policy of ‘reduce, reuse and recycle’ need to form the key part of government actions. We need also to place obligations on the producers of waste. When developing policy on waste, we must look at its creation by the manufacturer that feeds a conveyor belt of waste. An estimated 983,380 tonnes of packaging waste was generated in 2015 in the State. Plastic used in packaging accounts for 40% of Europe’s overall plastics. A large part of the reduction of waste must start with a reduction of what is placed on the householder in the first instance.

Extended Producer Responsibility is an environmental policy approach in which the producer's responsibility for reducing environmental impact and managing the product is extended across the whole life cycle of the product, from selection of materials and design to its end-of-life, and especially for their take-back, recycling and disposal.

The overall objectives cover:

- Integration of environmental costs
- Improved waste management
- Reduction of disposal
- Reduction of the burden on municipalities
- Design of environmentally sound products

The roots of EPR can be found in product liability, under which the manufacturer of a product is held liable for damage caused by that product to the consumer, if it was somehow defective or unreasonably dangerous. Under product liability, manufacturers are thus held liable for their products well beyond their factory gates. Product liability was already an extension of the producer’s responsibility, as before it was only responsible for the manufacturing process.

EPR is an application of the *Polluter Pays Principle*. The polluter is not necessarily the person whose activities give rise to pollution, but rather the economic agent that plays a decisive role in the pollution, like the producer, rather than the end user.

The producers have primary responsibility under EPR, but sharing responsibilities across the product chain is an inherent part of EPR. While the policy tool is called Extended Producer Responsibility, it should be borne in mind that all actors in the product chain and in society must participate in order to optimise its effects.

Limitations of the Majority Report

The Oireachtas report has not made reference to the growing issue we have with waste in society and its contribution to climate change.

Deposit Return Scheme

Sinn Féin proposed, in the Waste Reduction (Miscellaneous Provisions) Bill, the creation of a deposit return scheme; a deposit return scheme for plastic bottles, glass bottles, and aluminium cans. This will give an incentive to return these waste items and to prevent their disposal which is not sustainable and it places an incentive on householders to return this waste. This can be coupled with industry obligations to reduce packaging in the first instance. This will reduce our overall production of high fossil fuel items, such as plastics.

Single use Plastics

Plastics are having a detrimental effect on our environment. There is also the cost in terms of greenhouse gas emissions in production, as well as the immense cost for local authorities each year to clean up litter. Considering the problem we have with waste in the State, we need to take a wide approach to managing the chronic issue at hand. There is no sustainability in the many single use containers feeding the growing waste mountain.

Household Waste Collection

Local authorities traditionally provided waste collection services. Now, the Irish waste collection market is privatised with private waste management firms competing for business side by side. This is where several collectors are serving the same street or housing estate. This is not environmentally friendly and is out of line with other EU States. Neither local authorities nor the EPA are involved with the economic aspects of waste management, such as the setting of waste charges.

At the householder level, there are limited regulatory protections as exist with other utility suppliers, such as the energy market. We need to consider greater State control of household waste collection such as through the 'franchise' model, where each local authority may designate a single provider. We must also look at the feasibility of full local authority ownership. Every household in the State will have waste collection. Greater regulatory control of how waste is collected in the State is needed for both the environment and the householder.

Organic waste

Brown bins need to be across all households and free. This waste stream can be used for creating composting. However, the waste can also be used for aerobics digesters creating biogas. Alongside the agricultural sector, we need to ensure local authorities and those that produce large volumes of organic waste are directed toward recycling this material through composting or to create biogas.

High Level Recommendation

Tackling waste in our society also helps tackle climate change. It addresses emissions in terms of production and collection and obligations must be placed on the manufacturers in the first instance.

Subsidiary Recommendations:

- a) Establish a deposit return scheme for certain waste material, so that ordinary households are incentivised to return material;
- b) Place obligations on manufacturers to reduce the amount of packaging produced in the first instance;

- c) Ban single use plastics with exemptions for certain products such as medical equipment;
- d) Ensure greater State control of household waste collection.