

Response ID ANON-W3ZQ-NN6Y-Z

Submitted to **Call for Expert Evidence - Climate Action Plan 2021**

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About you

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Carbon Pricing and Cross-Cutting Issues

1 What further opportunities exist within our taxation system, beyond measures already implemented and planned, to promote emissions reductions, either on an economy-wide basis, or in specific sectors?

Please provide details in the text box provided:

Please note that we have reservations about the effectiveness of Ireland's current carbon taxation policy, and therefore propose an alternative approach to pricing carbon that includes directly limiting the fossil fuel supply through regulation. This is described under question 6 below.

Within Ireland, in addition to our proposal below, a levy could be charged on 'luxury' uses of carbon, e.g. on first class flight tickets and high-emissions luxury vehicle sales and rentals.

More generally, 'commons-based taxation' would encourage the judicious use of resources while avoiding the socially regressive effects of income tax or VAT. One example of this is a Financial Transactions Tax (FTT), which could provide significant financial support for decarbonisation, for example by helping to fund the national retrofitting programme. The Robin Hood Campaign estimates that revenue of approximately €320 to €360 million a year could be raised if an FTT were introduced that followed European Commission guidelines.

Another important commons-based tax is Site Value Tax (SVT), which, if implemented in parallel with other measures, could help to ease the pressure on the housing market in Ireland and thus indirectly make the energy transition more affordable for a majority of people. Research carried out in 2012 indicated that if a 2% SVT were introduced and replaced existing property taxes, stamp duty and rates, it would generate additional revenue of approximately €1 billion per annum: <https://smarttaxfiles.files.wordpress.com/2012/01/site-value-tax-in-ireland-identify-consulting-final-report.pdf>. That figure would probably be larger now.

2 What supporting policies might be required to offset the impact of any taxation changes on low income households or those most at risk from fuel poverty?

Please provide details in the text box provided:

The ESRI suggests in their report 'Carbon taxes, poverty and compensation options' (2020) that if a third of the revenue from a €7.50 per tonne increase in carbon tax were to be distributed in the form of increased welfare payments to the lowest-income fifth of households (plus single people living alone), this would offset the negative effects of the carbon tax.

However, this proposal would be based on an estimate of a finite and undependable source of income, and could possibly also lead to unwanted social effects by magnifying the stigma that is sometimes attached to people who are highly reliant on the state welfare system.

We suggest instead:

(i) significantly improving the welfare system for all Irish residents by introducing a Universal Basic Income (UBI) along with a social wage (universal basic services). Social Justice Ireland have provided suggestions on how this could be funded:

<https://www.socialjustice.ie/content/policy-issues/post-covid-19-basic-income-how-its-paid-and-how-get-there>. This would eliminate the stigma attached to receiving benefits and would ensure that any support provided was permanent and not subject to the vagaries of effective demand for fossil fuel.

We particularly recommend introducing a site value tax and using it to provide some of the funding, as this would help to offset any inflationary pressures generated by the UBI.

More information on UBI can be found on the website of Basic Income Ireland (<https://basicincome.ie>), Social Justice Ireland (<https://www.socialjustice.ie/content/policy-issues/type/basic-income>) and Feasta's Basic Income group (<https://www.feasta.org/category/basic-income/>).

(ii) Introducing a Financial Transactions Tax following the guidelines suggested by the European Commission (see question 1).

(iii) Sharing out half of the the revenue from a carbon tax (or fee, as proposed under question 6 below) on a per-capita basis in Ireland, with the other half to be used in support of international climate justice, preferably as part of an international carbon club that would include the other EU member states and a group of

low-income countries (see question 6).

3 What further measures might be required in the planning system to realise the objectives of the National Planning Framework in respect of climate action?

Please provide details in the text box provided:

The improvement of overall well-being needs to be prioritised, rather than economic growth.

Significant improvements in pedestrian, cycling and public transport infrastructure are of vital importance. Their planning should be carried out in close consultation with residents of the designated areas in order to ensure that they have the desired impact.

For example, public transport routes and schedules should be geared to not only meet the needs of people following a 'conventional' work schedule, but also people with variable work/care patterns requiring multiple short trips (to shops, schools, children's leisure activities, etc.) at different times in the day.

Please refer to Feasta's 2017 submission on the National Planning Framework for more suggestions:

<https://www.feasta.org/wp-content/uploads/2017/11/Feasta-submission-on-2040-NPF.pdf>

4 What specific additional measures might be required to promote sustainable growth in our urban centres, including to realise the potential of a "15-minute city"?

Please provide details in the text box provided:

A Site Value Tax would help to discourage property hoarding and speculation in urban areas.

"Community Wealth Building" practices, including locally-focussed green procurement practises by large anchor institutions and the introduction of community banks with a local remit, would help to increase the multiplier effect of funding in urban communities.

Small businesses could also be encouraged to issue coupons to allow people to support them through periods of financial struggle.

Improved infrastructure for pedestrians and cycling would help towards a '15-minute city' and would also have strongly positive health effects.

(Note: for clarity's sake we suggest avoiding the use of the phrase 'sustainable growth' in policy statements. We are aware that this is a challenge, since it is used liberally in EU documents. 'Prosperity' or 'Sustainable diversification' would be less ambiguous alternatives.

Widespread scientific evidence indicates that environmental degradation cannot be sufficiently decoupled from economic growth in absolute terms within the short timeframe that is available for us to act on climate mitigation and address biodiversity loss. Please see for example <https://eeb.org/library/decoupling-debunked/>.

The economy therefore needs to be reoriented so that it is no longer dependent on continual GDP growth and, indeed, can withstand some economic contraction if necessary.)

5 What specific additional measures might be required to promote sustainable growth in rural areas?

Please provide details in the text box provided:

We recommend providing much more active support for farmers' markets and Community Supported Agriculture programmes.

This report from Tasc proposes the implementation of a Community Wealth Building approach in rural Ireland:

<https://www.tasc.ie/publications/the-peoples-transition-community-led-development-fo/>

With regard to agriculture, we recommend the many specific and detailed proposals made in the recent Environmental Pillar/SWAN/Stop Climate Chaos paper 'Towards a New Agricultural and Food Policy for Ireland':

https://environmentalpillar.ie/wp/wp-content/uploads/2021/04/EnvironmentalPillar_SWAN_SCC_Agricultural_Food_Policy.pdf

(Note: as in question 4 above, for clarity's sake we suggest avoiding the use of the phrase 'sustainable growth' in policy statements.)

6 Are there further measures that the Government should take to channel private finance into low-carbon investments in Ireland?

Please provide details in the text box provided:

Private finance needs a clear legal framework in order to be channelled in the right direction. All enterprises and investors need to be subject to the same rules, since otherwise the 'good' behaviour of one company can easily be cancelled out by the 'bad' behaviour of another.

As this recent article in the Financial Times argued, there is currently a problem with 'brown-spinning' - i.e. of companies or investors selling off 'dirty' assets which then are used by other, less-scrupulous investors: <https://www.ft.com/content/c586e4cd-9fb7-47a3-8b43-3839e668fe3a>

A related challenge with regard to low-carbon investment is that a number of international trade treaties, particularly the Energy Charter Treaty, create a strong financial disincentive for profit-seeking companies to adopt genuinely greener practices and also cast a regulatory chill over governments' attempts to rein in environmentally damaging behaviour by companies.

We therefore urge the Irish government to:

(i) withdraw, as a matter of urgency, from the international Energy Charter Treaty, which is consistently being used to discourage strong climate mitigation action by exposing those countries which are party to the Treaty to the threat of costly lawsuits from investors or companies. Italy and Russia have both withdrawn from the Treaty, and Ireland is well within its rights to do so. More information can be found here:
https://www.tni.org/files/publication-downloads/one_treaty_to_ruled_them_all.pdf

(ii) lobby at EU-level for the entire EU bloc to:

- withdraw from the Energy Charter Treaty

- withdraw from any trade deals which include Investor-State Dispute Settlement clauses (which have a similar effect to the ECT's 'dispute resolution' function)

- create a 'carbon club' with a group of low-income countries, and together impose a hard and diminishing cap on the extraction and import of fossil fuels, with a Carbon Border Adjustment Mechanism applied to non-members of the club (who would become eligible to join the club if they met the required conditions.)

Given the absolute necessity to reduce emissions within a very short timeframe and the significant risk that a carbon tax's effects on emissions would be too incremental to have sufficient impact*, we believe it would be far preferable to impose a hard and diminishing cap on fossil fuel extraction and imports and to oblige fossil fuel producers and importers to buy permits at auction:

<http://www.capglobalcarbon.org>

<https://www.feasta.org/category/documents/projects/cap-and-share/>

While technically this would generate a carbon fee rather than a tax, it would nonetheless yield revenue from the use of fossil fuel (until the supply was phased out).

We are aware that capping the fossil fuel supply may be complicated for an EU member state to implement on the national level. We therefore urge the Irish government to lobby for it at the EU level. It could be brought about by expanding the existing ETS and moving it upstream (to the point of import or extraction). Revenue would be distributed on a per-capita basis among the participating states. We also recommend including a bloc of low-income countries in such a programme, so as to form a decarbonisation partnership which could then be further expanded.

More information about this approach can be found in our two October 2020 submissions to the European Commission:

<https://www.feasta.org/2020/10/15/balancing-with-a-doughnut-feasta-position-paper-on-the-revision-of-the-european-commissions-energy-taxation-directive/>

<https://www.feasta.org/wp-content/uploads/2020/10/Feasta-CBAM-position-paper.pdf>

- re-word those sections of the EU founding documents that prioritise economic growth, price stability and maximising consumption, e.g. Article 3 of the TEU, so that they instead emphasise well-being, fairness and economic stability.

* See for example this 2018 overview of the effects on emissions of carbon pricing, even at relatively high rates:

<https://www.sciencedirect.com/science/article/pii/S0301421518304063>

7 Are any changes required in Ireland's research policy to channel research funding into climate action-related topics?

Please provide details in the text box provided:

We would urge that more funding be provided for:

(a) energy-based analyses of the economy in Ireland, i.e. analyses from the perspective of ecological economics and/or biophysical economics. Energy is central to the economy, and our relationship with energy will change radically as decarbonisation progresses, owing to an increased 'energy cost of energy' and the intermittent nature of the supply of renewable energy. This needs to be explored in depth in order to identify how best to strengthen Ireland's resilience to potential economic risks.

(b) analyses of how the Irish financial sector could best be reoriented so as to become able to function effectively in conditions of zero economic growth or economic contraction, given the ecological constraints to continual GDP growth described above.

8 Is there any additional information you would like to submit in relation to Carbon Pricing and Cross-Cutting Issues?

Please provide details in the text box provided:

The ability of Ireland to decarbonise is being undermined by its unstable and inefficient banking and insurance systems and its overheated housing market. These are placing an unnecessary financial strain on many households and businesses, curbing their ability to adapt to a new and different kind of economy.

We recommend that:

(i) a network of public and/or mutual banks be established throughout Ireland. Our recent webinar, 'Banking on the Community', explored this proposal in some depth, with contributions from the Public Banking Forum of Ireland and the Northern Mutual Campaign:

<https://www.feasta.org/2021/03/31/banking-on-the-community-investing-locally-for-resilience-webinar-on-april-14/>. These would provide a locally-focussed and not-for-profit alternative to the remaining commercial banks.

(ii) A investigation be made into the potential of introducing a 'safe depository' system which would enable Irish residents to place some of their funds in a publicly administered account, enabling capital reserve and deposit insurance requirements to be relaxed for the commercial banks and thus exposing them to

competitive pressure, making the playing field more level for public and mutual banks (and credit unions), and reducing costs for customers.

(iii) In the medium to long term, Ireland lobby at EU-level for the ending of one-to-one parity between commercial-bank-issued money and central bank reserves, in order to help decouple the Eurozone from financial dependency on continual economic growth.

Proposals (ii) and (iii) are described in more detail here: <https://www.feasta.org/2021/04/30/towards-a-recession-hardy-irish-banking-system/>

(iv) A site value tax be introduced, as described above, in order to discourage property hoarding and speculation.

Electricity

1 What options are available to increase the penetration of renewable electricity beyond the 70% committed to in Climate Action Plan 2019?

Please provide details in the text box provided:

If a hard and diminishing cap was imposed on fossil fuel imports to Ireland (or, better yet, the EU), as proposed in section 1 of our submission, this would automatically spur increased investment in renewable energy and would guarantee its eventual domination of the electricity market.

2 What can be done to increase the uptake of offshore wind and solar PV in particular, in the context of the Programme for Government ambition?

Please provide details in the text box provided:

3 What role does renewable gas have in the power generation sector?

Please provide details in the text box provided:

4 What role could carbon, capture and storage have in decarbonising our power sector?

Please provide details in the text box provided:

5 What other opportunities exist to support the decarbonisation of the electricity sector?

Please provide details in the text box provided:

Strong State support for community-owned energy is absolutely vital to encouraging local 'buy-in'.

It is important to bear in mind that overall energy use will need to shrink considerably if we are to shift to a renewables-only economy, and there will also be a need to adapt to the intermittency - not just hourly, but also seasonal - of renewable energy:

<https://www.feasta.org/2019/06/08/propaganda-for-renewables-a-critique-of-a-report-by-oil-change-international/>

It would therefore be advisable to take a sufficiency-and-efficiency-based approach to the provision of electricity:

<https://www.lowtechmagazine.com/2018/01/how-much-energy-do-we-need.html>

In order to lessen the danger of economic instability or even collapse being triggered by this reduction in the energy supply, we recommend a series of reforms to the State's banking and taxation systems, as described in section 1.

6 What measures might be taken to improve the resilience of the electricity system to the impacts of climate change?

Please provide details in the text box provided:

Enterprise

1 What measures can be taken to accelerate the uptake of carbon-neutral low temperature heating?

Please provide details in the text box provided:

2 What measures can be taken to tackle high temperature heating in industry?

Please provide details in the text box provided:

3 What measures can be introduced to reduce to F-Gases in the Enterprise sector?

Please provide details in the text box provided:

4 How can we encourage the diversification away from cement in construction?

Please provide details in the text box provided:

Please provide details in the text box provided:

5 What role could Carbon Capture and Storage (CCS) have in industry, and what steps would encourage its deployment?

Please provide details in the text box provided:

6 What other opportunities exist to support the decarbonisation of the enterprise sector?

Please provide details in the text box provided:

As argued in section 1, a hard and diminishing cap on the import and extraction of fossil fuels would send a strong signal to markets and automatically reorient enterprises towards lower-carbon production methods.

We also urge the Irish government to withdraw from the Energy Charter Treaty and to lobby the EU to follow suit (as well as withdraw from any other treaties that include Investor-State Dispute Settlement). Such treaties can exacerbate a dangerous conflict of interest in enterprises with regard to decarbonisation, particularly those with a mandate to maximise profits to shareholders.

7 What measures should be taken to address the risks that climate change poses for enterprise?

Please provide details in the text box provided:

Built Environment

1 Can Ireland exceed the target of retrofitting 500,000 homes by 2030? If so, how?

Please provide details in the text box provided:

2 How should Ireland's training and education system scale to meet the skills requirements to achieve this target?

Please provide details in the text box provided:

3 Should Government consider bringing forward a phase out of the installation of fossil fuel boilers?

Please provide details in the text box provided:

4 Should further specific changes be made to Ireland's building standards be introduced to support the decarbonisation of Ireland's private and commercial building stock?

Please provide details in the text box provided:

5 What emerging technologies (e.g. in relation to heating, lighting, and/or building fabric) should be considered for use in Ireland's construction industry to promote further decarbonisation?

Please provide details in the text box provided:

6 What supports can we provide to assist the greater use of low-carbon building materials? How much consideration should be given to embodied carbon in construction materials?

Please provide details in the text box provided:

7 Are there specific technologies that should now be prohibited?

Please provide details in the text box provided:

8 What trade-offs between decarbonisation and air quality may need to be further considered in policy design?

Please provide details in the text box provided:

9 Are there specific household behaviour changes that should be considered? Should such changes be mandated by way of regulatory changes?

Please provide details in the text box provided:

Behaviour within households is very likely to change if the measures proposed elsewhere in this submission are implemented. For example, a cap on the availability of fossil fuel (accompanied by a price on carbon) should automatically encourage efforts to conserve energy.

Wherever possible however, we urge the government to take a consultative and participatory approach to climate action, including desired behaviour change within households, rather than imposing top-down regulations which could be interpreted as authoritarian with little or no discussion beforehand.

Our hope is that the widespread provision of affordable and better-heated housing, a fairer financial system, and a reliable social welfare system would make it far less likely that people will become stressed enough to be drawn into 'addictive' behaviour with regard to their energy use:

<https://www.feasta.org/2011/07/16/is-over-consumption-hard-wired-into-our-genes/> . These measures would also free up time and mental energy for engaging in

public participation.

10 What specific further measures should be considered to promote decarbonisation of Ireland's existing commercial buildings?

Please provide details in the text box provided:

11 Is there scope to further develop and deploy district heating opportunities in Ireland?

Please provide details in the text box provided:

Once again, a hard and diminishing cap on the extraction and import of fossil fuel at national or (preferably) EU level, as described in section 1, would have strong knock-on effects on all sectors of the Irish economy, including building.

12 What specific approaches should be taken to accelerate decarbonisation of Ireland's public sector building stock?

Please provide details in the text box provided:

13 What other opportunities exist to support the decarbonisation of the Ireland's building sector?

Please provide details in the text box provided:

Once again, a hard and diminishing cap on the extraction and import of fossil fuel at national or (preferably) EU level, as described in section 1, would have strong knock-on effects on all sectors of the Irish economy, included building.

14 Are there further specific measures and policies, including through planning and building regulations, that might improve the resilience of our building stock to climate change?

Please provide details in the text box provided:

Loans for retrofitting could be attached to the property rather than the property owner, making it possible to pass them along when the property is sold and thus encouraging homeowners who envision selling their property within a few years to invest in retrofitting.

Transport

1 What further policy measures might be required to enable Ireland to meet the CAP 2019 target of 936,000 electric vehicles on the road by 2030?

Please provide details in the text box provided:

As described in section 1, a diminishing cap on fossil fuel imports would automatically guide the market towards non-ICE vehicles.

It should be noted however that this target may not be realistic, as the availability of sufficient raw materials for the manufacture of such large quantities of EVs (considering the level of global demand) is uncertain: <https://www.ft.com/content/2f709342-3070-4b75-8924-3d9190f5c0c7> Strong encouragement of car-sharing and public transport use is therefore vital.

2 Is there scope to increase this target for 2030? What should the new target be?

Please provide details in the text box provided:

Since the manufacturing of EVs is not carbon-neutral and uses scarce resources, and since there are other adverse effects arising from the domination of the car in private transport, the existing target (assuming it is feasible) should more than suffice; it allows for approximately one vehicle for every 5 people.

There is no need for us to perpetuate our current traffic congestion problems and the corrosive effects of car culture, including on the freedom of movement and overall well-being of children.

3 What specific measures might be required in the commercial transport sector to encourage a change to EVs or other zero carbon alternatives?

Please provide details in the text box provided:

Evidence - including the experience of 2020 - suggests that the only way to guarantee significant absolute emissions reduction from transport is to reduce the overall amount of transport that is taking place.

As mentioned above, a diminishing hard cap on fossil fuel imports would send a strong signal to the transport sector in favour of emissions-light transport.

In the commercial sector, this could be helped along by promoting measures that shorten supply chains and diversifying local economies, such as Community Wealth Building.

While such measures may result in some job losses in the transport sector, they should also significantly increase job opportunities in sectors such as agriculture and renewable energy.

Obviously, some freight transport will continue to be necessary; wherever possible we recommend taking this off the roads and reducing its speed, so as to save energy.

Expanding the capacity of Iarnród Éireann Freight should help to reduce emissions. It may also be worth investigating the possibility of a revival of inland waterways for the transportation of some goods, as is being proposed in the UK:

http://www.britishwaterways.co.uk/media/documents/publications/Freight_on_our_waterways.pdf

4 What additional measures should be considered to promote greater use of public transport or active mobility options?

Please provide details in the text box provided:

Widespread car-sharing and improved public transport and pedestrian and cycling infrastructure are of vital importance. Their rollout should be underpinned by extensive public consultation.

For example, public transport routes and schedules should be geared to not only meet the needs of people following a 'conventional' work schedule, but also people with variable work/care patterns requiring multiple short trips (to shops, schools, children's leisure activities, etc.) at different times in the day.

Funding could also be increased for public information campaigns on the health benefits of active mobility (which are extremely striking).

5 What specific policies might be required to reduce overall passenger kilometres driven within the private car fleet?

Please provide details in the text box provided:

We are glad that this question is on the list, but we believe it should have been Question 1. An absolute priority is to reduce overall levels of transport.

Please see our answers to questions 3 and 4.

Additionally, there could be greater encouragement of car-sharing programmes.

People can be helped to make good choices regarding transport by educating extensively in the MAPS approach -- minimise, active, public, shared car if possible (electric for preference); single-passenger car: <https://earthbound.report/2021/05/13/maps-a-mnemonic-for-sustainable-transport/>

6 Is there scope to effect a change in the composition of the private car fleet to shift the vehicle mix away from higher emitting classes?

Please provide details in the text box provided:

As mentioned in section 1, we suggest imposing a levy on high-emissions luxury cars, including SUVs.

7 Is there scope to further increase biofuel blends rates beyond those already planned under the 2019 Climate Action Plan?

Please provide details in the text box provided:

8 Are there any specific obstacles in the planning system preventing greater modal shift?

Please provide details in the text box provided:

An overemphasis on economic growth, and an underemphasis on societal well-being.

9 Are there specific further measures that should be undertaken to increase the availability of electric vehicle charging points, whether in public areas or on private property?

Please provide details in the text box provided:

10 What could be done to make the public sector transport fleets more climate friendly?

Please provide details in the text box provided:

11 What changes should be considered in relation to the management of Ireland's road network (e.g. reducing speed limits, additional road pricing, or restrictions for specific vehicles in urban areas) to promote emissions reductions?

Please provide details in the text box provided:

All of the measures listed (reducing speed limits, additional road pricing, or restrictions for specific vehicles in urban areas) should help.

12 What other opportunities exist to support the decarbonisation of the Transport sector?

Please provide details in the text box provided:

Encouraging telecommuting wherever possible.

A considerable increase in the funding of the rail sector.

As suggested above, improved infrastructure and facilities for pedestrians and bicycles, including improved bicycle parking facilities.

Increased financial support for the purchase of regular bicycles and e-bikes.

As explained in section 1, changes to the banking and taxation systems, along with the withdrawal of Ireland and the EU from environmentally-harmful trade treaties, would ease the pressure on the economy to keep expanding regardless of the social and environmental damage this might cause. The transport sector is particularly strongly affected by this growth imperative.

13 What specific measures could be undertaken in transport infrastructure to address existing and future locked-in climate change impacts?

Please provide details in the text box provided:

Agriculture, Land Use, Forestry and Marine

1 What are the opportunities to increase take-up of measures identified in AgClimatise and encourage adoption of other practices which reduce emissions?

Please provide details in the text box provided:

For this section (on agriculture), please refer to the wide-ranging recent position paper published by the Environmental Pillar, SWAN and Stop Climate Chaos: https://environmentalpillar.ie/wp/wp-content/uploads/2021/04/EnvironmentalPillar_SWAN_SCC_Agricultural_Food_Policy.pdf, which Feasta contributed to, and whose positions Feasta endorses.

2 What policies and measures would be needed to support farmers diversify their farm activities to include opportunities such as bioenergy, vegetable growth, forestry, organic farming, etc?

Please provide details in the text box provided:

3 What can be done to maximise the use of manure and silage as feedstock for biomethane generation in closed digesters and inject into the gas grid to offset natural gas?

Please provide details in the text box provided:

4 What specific measures can be taken in agriculture, forestry and land use to adapt to climate change?

Please provide details in the text box provided:

5 What can be done to increase sequestration through forestry (afforestation, extended rotations, and improved forest management)?

Please provide details in the text box provided:

6 What opportunities are there to rehabilitate our peatlands and wetlands, and what can be done to realise these opportunities?

Please provide details in the text box provided:

7 What measures would support increased sustainable management of grasslands, including those areas on drained organic soils?

Please provide details in the text box provided:

8 What opportunities exist for increased use of cover crops, incorporating straw into tillage and for the application of regenerative agriculture practices? How can farmers be supported to take up these practices?

Please provide details in the text box provided:

9 What sort of role could Ireland's marine environment (lakes, seas) have in delivering climate mitigation? What are the building blocks that need to be put in place to support the role of the marine environment in climate mitigation (e.g. a regulatory framework, measurement and accounting rules)?

Please provide details in the text box provided:

10 What other opportunities exist to support the decarbonisation of the agriculture, land-use and marine sectors?

Please provide details in the text box provided:

Improved resourcing of agricultural and marine training throughout Ireland, with a strong focus on agroecological practises and the other measures described in the Pillar/SWAN/SCC paper referred to above (https://environmentalpillar.ie/wp/wp-content/uploads/2021/04/EnvironmentalPillar_SWAN_SCC_Agricultural_Food_Policy.pdf)

County Councils could help ensure local access to land for smaller growing and farming initiatives such as cooperatives and CSAs (member or farmer-led), especially involving young people wanting to enter farming.

Waste and the Circular Economy

1 How can we ensure that measures support sustainable economic models (for example by supporting the use of recycled over virgin materials)?

Please provide details in the text box provided:

Upstream regulation would have a strong effect on the use of sustainable materials in products. As argued in section 1, we urge the Irish government to lobby on an EU level for the introduction of a hard cap on fossil fuel extraction and imports to the EU, along with a Carbon Border Adjustment Mechanism that will impose levies on imported products with high levels of embodied emissions. This is explained in more detail in an October 2020 position paper which we submitted to the European Commission:

<https://www.feasta.org/2020/10/29/position-paper-on-the-eus-carbon-border-adjustment-mechanism/>

An upstream cap on the fossil fuel supply will effectively choke off the raw material supply of many damaging products and automatically redirect manufacturers towards the increased use of recycling.

Ireland could potentially impose such a cap unilaterally; however it would be far more effective in terms of emissions and waste reduction if imposed on the EU level, and also less likely to run into legal difficulties.

It is clear however that such a measure is not a silver bullet. 'Piecemeal' regulation will still be necessary for certain products, e.g. those which use harmful chemicals that do not derive from fossil fuels, or non-fossil fuel resources whose supply is scarce or whose extraction threatens biodiversity.

2 What other opportunities exist to support the decarbonisation of the waste sector and through the circular economy?

Please provide details in the text box provided:

Measures that help to diversify local economies can significantly reduce waste, as they shorten supply chains and reduce the emissions generated by transport.

We identify a number of such measures in section 1, including community banking and community wealth building.

Public Sector Leading by Example

1 What opportunities exist for the public sector to step up its climate ambition?

Please provide details in the text box provided:

The Public Sector could have a major and positive impact on the wider economy by using Community Wealth Building measures in the many 'anchor institutions' which it owns and manages across the country, including hospitals, universities and museums. Indeed, Community Wealth Building is relevant to most of the questions raised in this section.

An overview of Community Wealth Building can be found here: <https://cles.org.uk/community-wealth-building/what-is-community-wealth-building/>

2 What sort of practical changes would you expect the public sector to make in leading and delivering Ireland's climate ambition?

Please provide details in the text box provided:

3 How can the public sector support wider society to change? In the short-term, medium-term, long-term?

Please provide details in the text box provided:

4 What are the biggest barriers for the public sector in reducing greenhouse gas emissions and how can they be overcome?

Please provide details in the text box provided:

5 What other opportunities exist to support the decarbonisation of the public sector?

Please provide details in the text box provided:

6 What practical steps should the public sector take to adapt to climate change?

Please provide details in the text box provided:

Just Transition

1 Which regions, sectors, or industries do you believe will be most adversely affected by climate policy in Ireland and over what timeframe?

Please provide details in the text box provided:

A 2019 working paper by NERI, "Matching skills needs with skills reserves", (Goldrick-Kelly and Nugent), identifies three broad sectors which contribute close to 90 percent of emissions within Ireland but provide less than a tenth of employment. These sectors are agriculture, forestry and fishing; industry; and transportation and storage. They are all likely to see rapid changes if Ireland follows its legal obligations concerning emissions reduction.

However, decarbonisation will ultimately affect everyone in the Irish economy, since it will fundamentally change the quantity of energy that is used and the manner in which it is used.

2 What types of supporting interventions should be considered by the Government to address the specific areas identified?

Please provide details in the text box provided:

The same measures that we recommended for the sustainable diversification of urban and rural areas in section 1 of this questionnaire:

- community wealth building measures, including green and localised procurement by anchor institutions
- community (public and/or mutual) banking
- the introduction of commons-based taxation such as site value tax and financial transactions tax
- the introduction of a universal basic income and social wage (universal basic services)

While the last two measures listed are national in scope, they would particularly help areas which are suffering from economic deprivation.

3 What specific further measures should Government undertake in order to realise the benefits of the low carbon transition, including in relation to supporting the development of low carbon sectors of the economy, including employment in these sectors?

Please provide details in the text box provided:

Please see question 2.

4 What specific investments should be considered to support a just transition in Ireland?

Please provide details in the text box provided:

Please see question 2.

5 How should the State finance just transition initiatives and investments?

Please provide details in the text box provided:

Readers are probably aware that some funding for the Just Transition has been earmarked both by the State and by the EU.

Additional funds can be supplied from the proceeds of commons-based taxation including a financial transactions tax and land value tax, and a carbon fee, as described in section 1.

We recommend that the State avoid taking on new loans to finance the Just Transition, even low-interest ones. Given the uncertainty concerning the future economy's ability to expand and thus enable loan repayment, we believe it would be preferable to instead make full use of the existing funds, and any supplementary ones deriving from commons-based taxation, by increasing the likelihood that they will remain circulating in the economies where they 'land' through the measures listed under question 2.

We would argue that following these measures would also be preferable to prioritising Foreign Direct Investment, as the latter type of funding is not inherently place-based and may be liable to 'jump ship' if economic circumstances become challenging.

6 What changes should be considered in Ireland's social welfare system to support population cohorts that might be more adversely affected by the low carbon transition?

Please provide details in the text box provided:

The introduction of a universal basic income along with a social wage (universal basic services), as discussed in section 1.

7 Are there specific issues for consideration in Ireland's further education, training and skills system?

Please provide details in the text box provided:

Because of the intermittent and inefficient nature of renewable energy, the future economy will probably require much more hands-on, manual work than at present, especially in agriculture. This need not be viewed as negative, particularly if the jobs in question are well-paid with good conditions.

Agricultural and marine training should focus on agro-ecological techniques which are labour-intensive but generate little or no ecological waste.

Retrofitting of housing clearly requires a cohort of well-trained workers, as does the manufacture and installation of wind turbines, solar panels and public transport infrastructure.

8 What other issues should be considered by the Government to inform just transition policy in the 2021 Climate Action Plan?

Please provide details in the text box provided:

It is extremely important to also take into account the Just Transition of people outside Ireland, particularly in low-income countries, many of whom are already having to deal with extreme climate disruption.

For this reason, in section 1 we recommend that Ireland lobby for the EU to form a 'carbon club' with a group of low-income countries, in order to subsidise their energy transition and ensure that they have adequate access to needed resources, and withdraw from trade treaties which impede social and environmental protection. Please see section 1 for more details and references.

9 What additional supports could be considered for regions that are most at risk from the physical impacts of climate change?

Please provide details in the text box provided:

Additional Information

1 If you would like to submit some additional information as part of your response, you can now attach a PDF.

Please chose your file for upload:

Feasta submission on the 2021 Climate Action Plan- summary points.pdf was uploaded