



JUST FORESTS

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Environment Committee
Houses of the Oireachtas
Kildare Street,
Dublin.

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Dear Chairman

RE: Submission to Environment Committee – Carbon Action and Low Carbon Development Bill.

On behalf of Just Forests I wish to have the attached submission considered as a means of strengthening the Irish Government's Climate Bill. Ireland has the largest per capita consumption of tropical timber in the EU-thus adding enormously to our carbon footprint.

When Ireland's tropical timber imports are aggregated over the last 50 years, they represent a sizeable area of forest destruction. For example, to produce the country's (1996) imports on a sustainable basis would require an area of natural forest some 200 times the size of the Phoenix Park in Dublin. In 2000, Ireland's trade in tropical hardwoods increased by 140% in value over the 1999 figure. Levels of consumption have made Ireland one of the highest per capita consumers of tropical hardwoods in the EU.

Just Forests made two presentations to two separate Dail Committee's on this matter (2nd November 1994 & 12th May 2009) over the years and would be willing to do so again if requested.

I look forward to hearing from you.

Yours sincerely,

Tom Roche

Coordinator



1. Introduction

Irish Woodworkers for Africa Ltd, T/A Just Forests has been working on the issue of climate change since our founding in 1989. We have produced many development education resources on the link between forest decline and climate change. We know that climate change threatens to destroy biological diversity –the very life systems we depend on for our economic, social and environmental development.

- There is a direct link between climate change and poverty
- Climate scientists say deforestation contributes to more than 17 percent of the world's greenhouse gas emissions, nearly as much as the entire transportation sector worldwide.
- that the science of climate change is now beyond doubt. The more carbon emissions we put into the atmosphere the more the world is going to warm.
- That we are already seeing the impacts from average global temperature increases of approx. 1°C. These negative impacts are being felt across the world and here in Ireland.
- the impacts of climate change that you are most concerned about
- unequal impacts between and within countries
- impacts on biodiversity
- impacts on economy
- impacts on health

2. Executive summary

Environmental experts say deforestation contributes to greenhouse gas buildups in two ways: First, the trees are no long there to absorb gases from other sources, and second, the soil exposed by logging can begin to oxidize and emit gases. In addition, deforestation can ruin farmland, contribute to soil erosion and flooding, and destroy wildlife habitats. When Ireland's tropical timber imports are aggregated over the last 50 years, they represent a sizeable area of forest destruction. For example, to produce the country's (1996) imports on a sustainable basis would require an area of natural forest

some 200 times the size of the Phoenix Park in Dublin. In 2000, Ireland's trade in tropical hardwoods increased by 140% in value over the 1999 figure. Levels of consumption have made Ireland one of the highest per capita consumers of tropical hardwoods in the EU.

The [Stern Review](#) (published October 2006) identified reduction of deforestation as one of four key elements of future international frameworks for addressing climate change. The report noted that loss of natural forest contributes more to global carbon emissions each year (about 18%) than the transport sector. The largest emissions from deforestation arise when land is converted to agricultural production; especially when slash and burn techniques are used.

- to limit greenhouse gas emissions
- to ensure that all departments across government and all governments across time take our climate obligations seriously and take action effectively and consistently
- to provide certainty for business to invest in the low-carbon economy, etc..

Just Forests recommends the above for the following reasons:

- protection of people in low-lying countries
- protection of biological diversity
- protection/security of natural resources

3. Recommendations

Just Forests recommends the following proposals be taken into consideration by the Oireachtas Joint Committee on the Environment, Culture and the Gaeltacht.

- a. Insert a 2050 target of a80-95% reduction in greenhouse gas emissions into the Climate Bill
- b. Make sure the Expert Advisory Body has a respected and effective independent role within climate policymaking and implementation, including by giving it the power to publish its own reports
- c. Make the low carbon roadmaps every 5 years and ensure they contain carbon budgets
- d. Insert the principle of Climate Justice into the Bill
- e. Produce a responsible National Timber Procurement Policy in line with the new EU Timber Regulation (EUTR), which became law on Sunday 3rd March 2013
- f. A national roll-out of tree planting (a good way of sequestering carbon) in every county to ensure that Ireland is self-reliant in it's timber needs for the future.

4. Submission

Just Forests calls for a strong Climate Bill as a means of averting further damage to critical eco-systems, public health and the natural environment.

For example:

TARGETS

The programme for government committed to provide 'certainty surrounding government policy and a clear pathway for emission reductions'. Short and long term targets provide the certainty needed by investors, both businesses and householders, to invest now in low-carbon technology knowing that the payback will come as emissions fall and the cost of polluting rises. They also provide the impetus for timely and adequate action to cut emissions. Quantifiable targets are the only way to ensure accountability. They act as a clear benchmark against which to measure progress. Only a numeric target can be clear.

Given Ireland is already committed to EU and international targets, putting them into national legislation is about supporting a domestic policy cycle focused on achieving those targets and increasing transparency and accountability. **A 2020 target that covers the whole economy (and not just emissions included in the EU ETS) should be inserted to drive sector wide emission reductions. Targets for 2030 and 2040 should also be set to put Ireland on a trajectory for meeting the 2050 target.** Without phased targets, there is a risk that much of the emission reductions that need to be made could be left to the final hour.

A 2050 target is yet to be agreed at the European level but the European Council Heads of Government has stated as an EU objective the need to cut emissions by 80-95% by 2050. This is in line with the science, which states that emissions in developed countries should be reduced by the order of 80%-95% by 2050 if we are to avoid dangerous climate change (IPCC, 2007). **A 2050 target of 80-95% should be inserted to ensure Ireland is playing its part.**

Leaving targets out of the climate change bill threatens to undermine the fundamental role of this critical piece of legislation.

EXPERT ADVISORY BODY

The Expert Advisory Body plays a key role in terms of accountability and transparency. It is crucial that the Expert Advisory Body has the power to publish its own reports. The Bill in its current formulation leaves the publication of reports to the government's discretion. In order for this legislation to be effective, **the Expert Advisory Body must have the power to publish its own reports.**

LOW CARBON ROADMAP

The Low Carbon Roadmap must be more frequent than every 7 years – at a minimum every 5 years. This would align it closer to the cycle of political accountability. The Low Carbon Roadmap should also contain carbon budgets. The important difference between a target and a budget is that a target is about emissions at a single point in time, while a budget captures the total emissions over the period. While longer term targets are necessary as statements of Ireland's intention, these targets fall outside of the lifetime any government. An effective carbon budget mechanism, akin to the fiscal budget process, is

essential to ensure political accountability and timely action. **A provision for the inclusion of carbon budgets in the Low Carbon Roadmap should be included.**

CLIMATE JUSTICE

In rich and poor countries alike it is those who are more socially or economically marginalised who are affected most and who have the least means to cope. For many developing countries, their geographical position, dependence on rain-fed agriculture and underdeveloped physical and socio-economic infrastructure leaves them particularly vulnerable to increasingly frequent and intense weather events and slow onset changes such as increases in temperature. In the interest of solidarity and Ireland's strong track record in international development, **the Bill should contain the principle of climate justice.** This recognises Ireland's obligation to mitigation as well as supporting adaptation in developing countries.

BIODIVERSITY

Climate change policy is connected to many different areas of society, the economy and the environment. Climate change is a major threat to biodiversity and ecosystem services. While some responses to climate change (both mitigation and adaptation) have major environmental co-benefits, others could have negative impacts especially if implemented badly. **Reference to protection of the environment (explicitly biodiversity) should be included in the legislation.**