Submission to Consultation on Ireland's Draft National Energy and Climate Plan (NECP) 2021-2030

by

AGENDA CONSULTING
Corduff Hall, Lusk, Co. Dublin
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Draft Document Presentation

While the draft NECP includes an extensive amount of information, it reads more as a compendium of information, rather than a policy document. The layout of the document is poor in terms of style and presentation. This makes the document very difficult to analyse to all but the very dedicated. Presenting a document in light blue text with DRAFT embedded throughout does not make for easy reading, even for a documents with less than 294 pages. Any final document must give careful consideration to presentation and legibility if it is to be meaningful to the general reader and individuals who will be impacted by the Energy and Climate Policies. As part of the local authority development of the “FINGAL COUNTY COUNCIL DRAFT CLIMATE CHANGE ACTION PLAN”, careful consideration has been given to the importance of quality communication to Fingal stakeholders and this is given as an example of best practice.

Draft NECP Comments

The following comments seek to highlight a range of issues regarding the draft NECP. It is not a thorough critique of the document however the comments seek to highlight a number of critical issues identified within the document. The importance of this policy document would point to the need for strong stakeholder engagement on a regional basis. Such a communication strategy would help to refine the policy framework, inform stakeholders and create a far better final NECP which will deliver on the climate change and energy benefits that the country needs and requires.

The overarching policy is stated as:

“The National Policy Position towards 2050 aims for an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) across electricity generation, built environment and transport, and to become carbon neutral in the agricultural and land use sectors, including forestry, by 2050.”

It is critically important that the future policy overview addresses all industries and sectors which impact climate change in both positive and negative manners. Section iv. “Administrative structure of implementing national energy and climate policies” highlights the very broad range of Governmental responsibilities and the challenge of aligning all energy and climate change policies. It is essential that the NECP becomes the guiding policy framework, rather than the administrative box into which other departments feed their action lists on climate change.
It appears to date, that there is a disconnect between Government Departments in terms of policy coherence. The Agri-Food policy “Food Wise 2025” is noted in this regard, where production targets were developed to drive growth in animal production with little if any consideration given to either the climate change impact of that policy or the potential that agriculture can play in a positive role to reduce Greenhouse Gases.

In terms of “Dimension: Security, Solidarity & Trust” it is noteworthy that while renewable energy sources have been growing in recent years, the dependence on fossil fuels remains high at 90%. The draft document notes that “In the oil sector, energy policy is to promote market flexibility and competition as a means to ensure security of supply.” While this may have been an oil sector energy policy, it is not a policy which addresses energy and climate change. The Energy Union five dimensions include:

(i) Energy security based on solidarity and trust;
(ii) A fully integrated European energy market;
(iii) Energy efficiency contributing to moderation of energy demand;
(iv) Decarbonising the economy; and
(v) Research, Innovation and Competitiveness.

It would simplify Ireland’s strategy and make it easier to understand if the strategy is grouped under these five dimensions. While “Table 6: Summary table of current policies and measures” seeks to do this, it does not give an understanding of the relative importance of the various policies and policy stakeholders. This is an area that must be significantly improved if the priority impacts are to be identified and resourced in a manner which maximises climate change impact over the coming years. The same comment is relevant to Table 5 which refers to NDP “transition provisions”.

It is unclear as to why section 1.3. “Consultations and involvement of national and Union entities and their outcome” forms part of this Draft document.

Page 120 deals with Transport proposals and analysis and notes the following:

Alongside national policy objectives, the transport sector is also bound by certain commitments at EU level. The Renewable Energy Directive specifies a legally binding 10% renewable energy in transport target to be achieved by all Member States by 2020. The Biofuels Obligation Scheme is the primary mechanism being deployed to achieve this target by 2020. Progress is being made in increasing the share of renewable energy in Ireland’s transport energy. By end 2017 this share was 4.1% or 7.4% are applied in accordance with the Directive.

It is considered that the targets being set with regard to Biofuels are not progressive enough. The shift to biofuels within the scope of existing vehicle engines is a simple and easily implemented policy which will have immediate impact with regard to GHG reduction. In addition the targets set are being skewed by “double counting” of waste oil in the diesel sector. The target setting should be two pronged, firstly the percentage of renewable energy to be used in the transport sector, which should be set at 12% in the short term and
the second target of shifting from E5 to E10 petrol fuel by 2020. The latter shift will ensure that all forecourts are designed to transfer to the E10 fuel at the same time and an information campaign can be undertaken to explain the change and the benefits that accrue from using greater volumes of bioethanol in our vehicles.

The proposed biofuels blending obligation of 11% from January 2020 is simply a recognition of the status quo for today’s biofuels deployment in Ireland, i.e. 5% real use of ethanol in petrol plus 7% real biodiesel, which is reported as 14% under double counting. This is not an appropriate policy to bring about significant environmental benefits. A 12% obligation from 2020, instead of 11%, would bring E10 petrol into the system.

The draft document (page121) states “A commitment to advance the existing biofuels obligation scheme by consulting on moving to higher biofuels concentrations in our fuel mix;”. This is not a strategy for addressing energy and climate change.

Page 122 references agriculture under the heading Agriculture and Forest Sector. This section goes on to list a range of “key measures” however this section is simply a list of actions without any direction to priorities or impacts of the various actions. The sections notes “The long term vision for the agriculture, forest and land use sectors is based on an approach to carbon neutrality in these sectors, which does not compromise capacity for sustainable food production.” This long term vision is fundamentally flawed as it seeks to maintain the growth in beef and dairy sectors, the key drivers of GHG’s in agriculture, on the basis of that such production will be sustainable. It is clear from this section that the NECP draft document has simply taken the input from the Department of Agriculture and inserted it into this Draft document without any critical analysis of the proposed actions. None of the actions proposed have been quantified in terms of positive or negative impacts in terms of climate change. A critical analysis of the FoodWise 2025 policy document will illustrate the lack of coherence with the climate change targets set for Ireland. This anomaly is detailed on page 192 as follows:

Agriculture emissions increased by 2.7% or 0.53 Mt CO2eq in 2016 following an increase in 2015 of 1.5%. The most significant drivers for the increased emissions in 2016 are higher dairy cow numbers (+6.2%) with an increase in milk production of 4.0%. In the 5-year period 2012-2016, dairy cow numbers have increased by 22% and corresponding milk production by 27%. This reflects national plans to expand milk production under Food Wise 2025 and the removal of the milk quota in 2015. In 2016, there were also increased CO2 emissions from liming (+8.4%) and urea (+26.5%) application. Other cattle and pig numbers increased by 3.0% and 3.7% respectively. Total fossil fuel consumption in agriculture/forestry activities increased by 5.0% in 2016.

Furthermore agriculture policies need to recognise the role that agriculture can play in the generation of sustainable energy as well as sustainable food. Creating a new balance between energy and food production is critical to delivering on Ireland’s climate change targets.

It is essential that All- of- Government Climate Action Plan approach is taken as proposed and that it clearly sets out which Departments are delivering either positive or negative impacts in terms of climate change, against a timeline which priorities actions that deliver the largest impact in the shortest possible timeframe.
Under the various support schemes the Support Scheme for Renewable Heat is critically important to business development in the renewable energy sector. Three energy sources are referenced: Biomass, anaerobic digestion (AD) and biomethane grid injection. It is noted that ‘bioethanol’ production is not included within the scheme, yet bioethanol production in Ireland will be critically important as Ireland transitions from E5 to E10 as noted above. It is noted that crop based ethanol is the lowest cost climate measure there is for transport today.

There is a direct link between AD and biomethane. AD also has the potential to provide consistent electrical power which can be fed into the national grid, thus avoiding the necessity to access the Gas Networks Ireland (GNI) gas pipeline. The policy framework in Germany over recent years has enabled the growth of on-farm AD units that deliver both heat and electricity to end users. The GNI pipe network will be a critical control point for direct injection of gas. In this regard it should also be noted that not all gas is delivered via the GNI pipe network. Any support in terms of biomethane should therefore encompass any biomethane producer, irrespective of the manner in which it is distributed.

In terms of power generation the draft NECP states that As set out in the National Development plan, the Government intends that, by 2030, peat and coal will no longer have a role in electricity generation in Ireland. It is noted that Bord na Mona stated policy is to stop peat powered electricity generation by 2028.

The inconsistency in presentation of data across a range of tables is very confusing and difficult to understand e.g.

- Table 36 provides a detailed sectoral breakdown of GHG emissions
- Table 37 & 38 projections exclude agriculture as a category
- Table 39 provides a template for current share of renewables, however the modelled scenarios in Tables 40 and 41 are a different layout and have inconsistencies with the 2017 data (RES-H and RES-T).
- Tables 42 and 43 revert back to standard sectors of Industry, Transport, Residential, Services and Agriculture / Fisheries
- Table 44 fails to include agriculture as a sector.

Target Setting

It is not until page 283 that it becomes clear as to the fact that the Draft NECP document will not meet the 2030 non-ETS target of 380.2 Mt CO$_{2\text{eq}}$ when it states that:

The 2030 cumulative non-ETS emissions target is 380.2 Mt CO$_{2\text{eq}}$ which means that, given current projections, at best Ireland is projected to exceed its target by 42.5 kt CO$_{2\text{eq}}$ in the high oil price With Additional Measures scenarios. At worst, without any additional policies and measures and in a low oil price environment, Ireland is projected to exceed its target by 94 kt CO$_{2\text{eq}}$.

This is a shocking conclusion to arrive at, following the level of information presented in this document. Furthermore it is completely at variance with the objective of “Ireland should plan its policies in the long-term to 2050 and aim to be a global leader in the green economy.”
This NECP scenario analysis highlights a fundamental error in the preparation of this document. The target emissions in 2030 should be the minimum reference point that the NECP document must achieve. The scenario planning should seek to reverse engineer the process such that an appropriate set of priorities and measures are put in place in a timely manner to meet the agreed 2030 targets. These measures and priorities must be worked through the various sectors and Departments so as to deliver the 2030 target at the very minimum. Scenario planning should seek to exceed the 2030 agreed target rather than aim to miss the target.