To: Department of Communications, Climate Action & Environment

From: BEET IRELAND

22 February 2019

Submission to Consultation Draft National Energy & Climate Plan (NECP) 2021-2030

We refer to the above and wish to make the following comments for your consideration:

1. The topic of climate change is increasingly being raised as a major policy issue against which Ireland as a country is poorly performing. Climate change is a long term problem requiring short, medium and long term policy responses.

2. Ireland, while having a poor track record to date, has the potential to be a policy champion going forward, providing the country takes and implements the correct policy decisions.

3. Coherence of policy across Government Departments is critical if Ireland is to become a policy champion.

4. Transport and agriculture are two of the sectors that must seek to bring about important policy initiatives if the country is to make real progress. Both Departments must synchronise and harmonise their policies to best effect going forward.

5. Agricultural policy has been heavily focused on food production, especially beef and dairy, which in turn has created added supply of Greenhouse Gases. Agriculture must become a supplier of sustainable energy sources which will assist with climate change improvements into the future. The sustainable production of bio-ethanol and bio-diesel is therefore of critical importance. In this context the NECP must introduce a suitable policy framework to create the market for the sustainable production of bio-ethanol and bio-diesel.

6. There is significant concern that the “double counted” biodiesel policy is masking the actual progress or lack of progress in the reduction of GHG emissions in the transport sector. NECP policy must be based on real change and real improvements to GHG reductions if Ireland is to become a climate change champion.
7. One of the simple and easy policy changes that can deliver climate change improvements would be to shift from E5 to E10 petrol in the transport sector. There are no barriers to introducing this change, apart from Government policy. The added benefit will be the production of the new demand for bioethanol within Ireland, e.g. via energy beet. The alignment of Government Department policies is therefore essential if the full environmental and economic benefits of this change are to be maximised. While this change is already signalled via the draft NECP, it is not scheduled to be introduced until 2030. This timeline is too long. The introduction of E10 fuels should be programmed for 2020.

8. 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.

9. The draft NECP fails to comprehensively address the GHG targets set for Ireland by 2030. Furthermore it does not address the conflict between Department of Agriculture policies of expanding production in beef and dairy with associated GHG emission expansion and the Dept of Communications, Climate Action and Environment policy requirement to reach GHG emission targets set for 2030.

10. The final NECP must provide a policy framework which facilitates the development of renewable biofuels and biogas with associated heat benefits for supply of renewable electricity, gas and heat to both utilities and businesses. The draft NECP fails to adequately address this policy framework.