

National Draft Mitigation Plan March 2017
Forest Friends Ireland Submission

Submission to:
Draft National Mitigation Plan Consultation
Climate Policy Division
Department of Communications, Climate Action and Environment
29 – 31 Adelaide Road
Dublin
D02 X285

21/4/17

Firstly the document cannot be regarded as a plan. Secondly it lacks specificity. It is not an exaggeration to say that the time we have is limited to stave off environmental disaster. Deforestation continues at an alarming rate, in spite of the fact that forests provide approximately fifty percent of our oxygen supply.

The delicate balance in the oceans whereby phytoplankton supplies the other fifty percent may not be maintained as the health of our oceans cannot now be guaranteed. Ninety seven percent of climate scientists agree that human caused climate change is happening here and now. Global sea levels have risen about 7.5 inches since 1870.

To date, the climate change debate has focused almost entirely on CO2 emissions and has failed to quantify the ‘methane time bomb’ that is in the making. World-wide, peat bogs store at least two trillion tons of CO2. This is equivalent to a century of emissions from fossil fuels. It is claimed by some scientists that there is in fact a ‘permafrost methane time bomb’ with unknown and possible dire consequences.

We request the minister to take into consideration the following in preparing the National Mitigation Plan.

AGRICULTURE:

Agriculture is responsible for 30% of emissions globally and considerably more than that nationally, due to our farming model of predominantly meat and dairy. The promotion with appropriate incentives to create a shift to small scale restorative agriculture, incentives for young people to get into the field of growing vegetables for local markets, support for farmers who want to reduce their inputs

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FORESTRY:

Forest Friends have been concerned ever since its inception about National plantation monoculture short rotation forestry using mainly non-native exotic species.

We feel that a move away from this policy should be carefully considered. Ireland's native trees are mainly hardwood and mature with varying life spans, providing for cropping at different times. They also provide for the reestablishment of continuous canopy forests. They are not acidic in contrast to conifer trees thus less damaging to rivers and spawning grounds.

Ireland at present imports more hardwoods from rainforest areas per capita than any other EU country.

By growing our own native hardwoods we would be helping to protect rainforest, one of our two main oxygen suppliers. Plantation forestry does not provide for trees growing to full maturity.

A fully mature tree it has been reliably established can have a financial value of in the region of 200,000 dollars taking into account all the functions it would have carried out during its lifetime (Professor T. M. Das of the University of Calcutta: ref Update Forestry Michigan State University-'*The value of a tree*').

As in the case of other policies forestry should maximise the participation of local communities in the entire process and recognise their stakeholder roles. Forest Friends by means of the 'Peace Forest Ireland Project' has sought to maximise public participation with the involvement of state and other agencies.

Recent reporting on the 'Peace Forest Ireland Project' can be followed at the following links:

<http://www.bbc.co.uk/news/uk-northern-ireland-39230636>

<http://www.belfasttelegraph.co.uk/news/northern-ireland/peace-forest-sprouts-at-former-army-base-in-forkhill-35520075.html>

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PESTICIDE USE:

The use of pesticides which are carcinogenic, persistent and damage the immune system should be taken out of use.

HEMP: Hemp has relevance to all sectors. It is a fast growing and can be used for construction, insulation, fireproofing, paper manufacturing, clothes and medicinal uses. It can provide the opportunity for forest tree conservation and carbon storage.

Hemp was once grown at the individual household level. The state should introduce a new scheme to encourage usage at all levels.

RETROFITTING:

We feel that the retrofitting of existing buildings should be spelt out in great detail with regards to all aspects, with an objective of funding for a survey of all buildings and generous grants. This would also provide for significant employment opportunities.

NEW BUILD:

A new approach to all aspects of new building is required. Carbon neutral should be a requirement. Solar roofs should be part of all new build design.

BUILDING REGULATIONS:

The Building Regulations need to be revised in order to achieve higher standards throughout the building industry.

ECOFRIENDLY CEMENT:

A greater move to the use of Eco friendly cement should be actively pursued and promoted and subsidised by government. There are a number of operators providing suitable product.

TRANSPORT: THE MODAL SPLIT BETWEEN PUBLIC AND PRIVATE

There should be specific objectives with regard to the target for the modal split between public and private transport with a significant change in favour of public transport, for example in the case of the journey to work.

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VEHICLE TECHNOLOGICAL ADVANCES:

Huge technological advances have been made resulting in more environmentally friendly car and other vehicle design. Zero emission vehicles, electrical and hybrid and hydrogen fuelled models by a whole range of manufacturers are now in use.

Government should take a more proactive part in promoting best practice and in providing for more refuelling points. The highest standards, zero emission vehicles should be the order of the day where public funds are involved such as in the case of public transport, government, public service and local authority based enterprises.

The government could be more proactive providing more attractive incentives to bring on board the most environmentally friendly technologies.

WALKING AND CYCLING:

A report from the United Nations calls on national governments to seriously increase their spend on active travel, if they wish to save lives and have a healthier populace. The report, released in 2016, suggests that 20 percent of transport budgets should go to walking and cycling. ("*Global outlook on walking and cycling*")

CARBON MILES:

The whole approach to trade in terms of carbon miles and the climate implications should be re-examined. This has never been seriously looked at and the plan fails to address the problems resulting and remedial steps needed to address them.

SHIPPING'S CARBON FOOTPRINT:

It is a fact that shipping is a major contributor to carbon emissions. Holiday cruises are major contributors and the efficiencies necessary to mitigate emissions should be identified.

FREIGHT:

This aspect of transport has been neglected and there are huge gains to be made by shifts from road transport to rail. Plans should be drawn up to facilitate the

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required changes with detailed costings. Significant investment would be needed and should be sourced, even to the extent of a redesign of the whole rail system.

MICRO RENEWABLE ENERGY:

This aspect has been neglected in Ireland in contrast for example to Germany where 50% of energy is generated at the individual household level. Generous grants and promotion of solar, wind and other technologies should be a priority. Micro renewable energy devices at the individual residential level should become the norm rather than the exception which is the case now.

METHANE:

Methane is more twenty times plus more heat retentive than CO₂. For that reason additional attention should be given to its mitigation than is the case at present. The message needs to be grasped by the politicians and the public that conservation of our bogs should be a priority because of the methane that they store.

Also at the individual farm level methane should be captured and used as a useful product with regard to the sustainable energy of the farm. The intensity of beef and dairy farming in Ireland results in serious emission levels compared with other EU countries.

JOB CREATION:

It has been estimated that up to 100,000 jobs could be created as a result of a major shift from carbon based energy to renewable.

COMMUNITY PARTICIPATION- STAKEHOLDER APPROACH:

A true stakeholder approach is based on parity of esteem with appropriate mechanisms and opportunity and supports including financial for community participation. The *Aarhus Convention* should be fully implemented in this regard.

CLOSING DATES FOR PUBLIC CONSULTATION:

Due consideration should be given to the closing dates for public consultations. It is not appropriate that the closing date for the National Mitigation Plan is 26th April 2017 and the Nitrates Action Program is the 28th. April 2017 and the

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National Clean Air Strategy is 28th. April 2017, - i.e. all three due at the same time. Communities and NGOs have limited resources and these should be better spaced out to facilitate participation.

COOPERATIVES: The government should consider the promotion of the development of cooperatives in order to facilitate communities better working together and realising their potential with increased empowerment and constructive involvement.

John Haughton

Chairman Forest Friends Ireland.

+353 (0) 852536650

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