

FH WETLAND SYSTEMS Ltd.

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Climate Mitigation and Awareness Division – LTS,
Department of Communications, Climate Action and Environment,
29-31 Adelaide Road,
Dublin 2.

19 December 2019

Re. Consultation on the Long-Term Strategy on GHG Emission Reduction.

Dear Sir/Madam,

FH Wetland Systems is an environmental consultancy company based in Co. Clare and operating throughout Ireland. We have over 20 years of experience in addressing issues relating to farmers, homeowners, industry and public bodies, particularly in the areas of water quality, environmental protection and sustainability. What is clear from this experience is that policy changes that support nature, wildlife and climate action can have much larger impacts than changes by individuals acting alone. Policies encouraging proactive change in public behaviour and business practice are urgently needed.

The Irish government has a strong tradition of promoting social justice around the world through our work with the UN, Irish Aid and other organisations. On an environmental front we were one of the first countries to introduce a plastic bag tax (<https://www.irishtimes.com/opinion/ireland-can-lead-charge-in-war-against-plastic-1.3374066>) and to commit to divestment from fossil fuel investments (<https://www.theguardian.com/environment/2018/jul/12/ireland-becomes-worlds-first-country-to-divest-from-fossil-fuels>). We can be one of the first countries to devote serious thought and effort to the tackling of climate change, both with emissions reductions and with carbon sequestration, but to do this we need to start implementing changes across many sectors of society and the economy that we have shied away from to date. The recommendations of the Joint Oireachtas Committee on Climate Action; the Citizens Assembly and the Youth Parliament all give a good basis for immediate action, so I won't repeat here the many valid and valuable measures that they have outlined.

In this submission I have chosen not to respond in the format set out in your questionnaire. Both the original deadline for submissions (until it was extended to the end of December to include an extra two weeks over the holiday period) and the nature of the questions may lead some to conclude that you do not wish to hear from members of the public or those working in the area of environmental protection at all. To seriously tackle climate change we will need to welcome all voices, from all sectors of society, and then to give feedback to those who contribute that suggests that the government is listening and responding to those voices.

The general headings in the questionnaire format are as follows:

1. Electricity generation
2. Business and enterprise
3. Built environment
4. Travel and transport
5. Agriculture, forestry and land use
6. Waste and the circular economy
7. A just transition

In terms of emissions reductions, there are two unifying policy issues that would make real change in every one of the above sectors.

1. The first is to cap “black carbon” use within Ireland (fossil-fuel-based carbon as oppose to “green carbon” which is short term biomass-based carbon) and to tax the sale of carbon,

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returning the revenue equally to every person in the country. This would have the balancing effect of creating a high price on carbon, borne by the user of black carbon and its many and varied uses and associated products and services, while sharing the revenue equally to avoid fuel poverty amongst those least able to make the transition at present from coal use to solar, for example. See Feasta's Cap and Share proposals for a solid explanation of this process (www.feasta.org/documents/energy/Comhar_Cap_and_Share_Report.pdf).

2. The second is to engage in the process of degrowth within the Irish economy (<https://www.irishtimes.com/opinion/mindless-growth-robust-scientific-case-for-degrowth-is-stronger-every-day-1.4011495>). Our current debt-based system of money creation relies inherently on ever more income generation to pay back interest on loans. This method of introducing money into society leads inevitably to ever increasing pressure on the natural world. The international financial system is straining at the seams anyway, so it would be a fitting time for Ireland to grasp this particular nettle and lead the way into a more just, equitable and ecologically survivable future. See Charles Eisenstein's transcript for additional information on this issue (<https://charleseisenstein.org/video/a-better-money-system/>), or Feasts's link to debt based money and climate change (<https://www.feasta.org/tag/debt-based-money/>).

Emission reductions can help to reduce our contribution to the problem of climate breakdown, but with temperature increases already well underway we urgently need carbon sequestration as well. The following sequestration practices, all selected as being relevant to Ireland and applicable to the Agriculture, Forestry and Land-use section of the questionnaire, have already been identified as amongst the top 80 solutions in reversing climate breakdown (<https://www.drawdown.org/solutions-summary-by-rank>):

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|-----------------------------|------------------------------|
| 1. Silvopasture | 10. Multistrata agroforestry |
| 2. Regenerative agriculture | 11. Forest protection |
| 3. Temperate forests | 12. Perennial biomass |
| 4. Peatlands | 13. Coastla wetlands |
| 5. Afforestation | 14. Composting |
| 6. Conservation agriculture | 15. Nutrient management |
| 7. Tree intercropping | 16. Biochar |
| 8. Managed grazing | 17. Green roofs |
| 9. Farmland restoration | |

Together these different, mostly land-use based, practices can help to mop up excess atmospheric carbon and restore atmospheric concentrations to safe levels.

Above all, I urge you and your department to push for immediate implement of the many solutions that are already proven to be effective rather than continuing with any further delay. We must not let the perceived cost of climate and biodiversity protection and restoration dissuade us from taking action. As succinctly put by a former senior economist in the environment department of the world bank: "The economy is a wholly owned subsidiary of the environment, not the reverse" (https://en.wikipedia.org/wiki/Herman_Daly).

Please do not hesitate to call or email with any questions or to discuss any of the above.

Yours sincerely,

Féidhlim Harty



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