8 Dundela Avenue,
Sandycove,
Co Dublin, A96D6V3.

November 29, 2021

An Taoiseach, Mr Micheál Martin, TD
Department of the Taoiseach, Government Buildings, Merrion Street, Dublin 2

An Tánaiste, Dr Leo Varadkar, TD
Department of Trade, Enterprise and Employment, 23 Kildare Street, Dublin 2

The Minister for Environment, Climate and Communications, Mr Eamon Ryan, TD
Department of the Environment, Climate and Communications, 29-31 Adelaide Road, Dublin 2

Subject: The Need for Pragmatism in Climate Action

Dear Government Leaders,

1. Introducing ICSF

Since its founding in 2016, the Irish Climate Science Forum (www.ICSF.ie) has advocated realism in climate science and prudence in climate action. The ICSF is motivated by the imperative to inform national climate/energy policymaking in the best long-term interests of the people of Ireland, without any vested interests. In more recent times, the ICSF is cooperating closely with world-leading scientists in more than 30 countries through the Dutch-based CLINTEL think-tank (www.CLINTEL.org), and has with them organised a lecture series by leading international scientists, see https://www.icsf.ie/lecture-series.

2. Lack of balanced communication of Climate Science

Having digested the recent CCAC *"Carbon Budget and Technical Report"* and the DECC *"Climate Action Plan 2021" (CAP21)*, the ICSF sees that the Government is set to embark on a Climate Action Plan which, though well intentioned, is unfortunately misinformed on many scientific, engineering and economic aspects.

This misinformed situation has arisen due to "group-think" predicated on an imagined "climate emergency", starting from the Citizens' Assembly and continuing right through the Joint Oireachtas Committee into the legislative process. Several previous ICSF submissions to Government and other agencies involved have unfortunately been ignored. Furthermore, in our view, the State agencies, particularly the EPA, CCAC and RTÉ, have evidently failed in their statutory duties to give balance in the climate debate, engaging in advocacy instead.

In our view, the information on climate science put forward by the Government and State Bodies is so one-sided that action could be contemplated under the precedent of the McKenna Judgement. We therefore respectfully suggest that it is now time that alternative views are openly heard before the current mistaken climate policy further unfolds, and that is the purpose of this letter.

3. Taking stock on the Real State of the Climate

Government policy, based on the perception of there being a "climate crisis", is not at all supported by real-world observations. The state of the climate is unfortunately also biased in daily media reporting. It is therefore necessary, we suggest, to add some perspective.

Ongoing global temperature observations provide evidence that IPCC climate models significantly over-estimate warming due to the GHG (Green House Gas) influence, and in particular that the extreme scenarios of its Fifth and Sixth Assessment Reports (the so-called RCP8.5 of AR5 and SSP5-8.5 of AR6) are highly implausible. In the real world, current global temperature is now about 1°C above that of the Little Ice Age, which with that of the Dark Ages of around 500-800AD, were the coldest periods in the last 2,000 years.

Modern era satellite temperature data, the most comprehensive available, confirms an average global rate of temperature rise over the last 40 years (when adjusted for natural perturbations like volcanic eruptions) of just on 0.1°C per decade, pointing to less than 1°C further rise by 2100, then reaching a temperature similar to those of the Minoan, Roman and Medieval Warming Periods, in which civilisations thrived.

Concerning global mean sea level, one hundred years of tide gauge readings indicate a linear rate of rise of 1-2mm/year, while some 30 years of satellite altimetry data indicates a rate of rise of about 3mm/year. Even taking the higher figure implies only 25cm further rise by 2100, not in the range of metres as cited by some sources.

As regards the cryosphere, Arctic ice has been stable over the last 10 years, with many ships currently ice-bound due to a record early freeze-up. The Greenland ice sheet status is similar to that of the 1930s. The Antarctic is experiencing record cold temperatures. Glacier retreat regularly reveals vegetation and historical artefacts from previous warm periods.

Trends in so-called "extreme weather events" are frequently misreported by media. Rigorous data analysis (confirmed by IPCC in AR6) indicates no increased trends in flooding, drought (meteorological or hydrological), wildfires, tropical cyclones, winter storms, thunderstorms, tornadoes, hail, lightning or extreme winds, while there is some evidence for increasing heat-waves, heavy precipitation, droughts (ecological and agricultural), not surprisingly, given a mildly warmer planet, whatever the cause.

In our view, none of the above observations portend an imminent "climate emergency".

4. Critique of the CCAC Carbon Budget and Technical Report

The CCAC *"Carbon Budget and Technical Report"* goes to great lengths in modelling of the proposed Irish CHG mitigation trajectories to 2050, which it admits, if achieved, would reduce global temperatures by *only a few thousandths of a degree* by then. These results again do not point to a "climate emergency", and also tacitly admit (as does IPCC in AR6) that mitigation in the coming decades will have negligible impact on climate.

As a further reality-check on the non-effectiveness of mitigation, the COVID-19 pandemic reduced global GHG emissions by about 6% in 2020, which reduction had negligible influence on global CO_2 concentration, and by implication, had negligible influence on climate.

The corollary is that the proposed 51% reduction in Irish GHG emissions by 2030, if ever achieved, would have infinitesimal impact on climate, sea level or so-called “extreme weather” events. A further deduction is that the only penalty for climate policy inaction would be any fines for non-compliance with EU/international agreements. Instead of mitigation, prudent adaptation (mentioned only in passing in the CCAC Report) to whatever modest climate change occurs in the coming decades, would make pragmatic economic, engineering and social sense.

The CCAC appears not to appreciate the scientific bias and weaknesses in the latest IPCC AR6 Summary for Policymakers (SPM), which were recently highlighted in an ICSF/CLINTEL letter to the IPCC Chair, see https://clintel.org/wp-content/uploads/2021/10/Critique-of-AR6-Clintel-ICSF.pdf. In essence, many of the findings buried in the AR6 Report itself were found to suffer from bias when presented in the Summary for Policymakers.

Of real concern, the CCAC Report duly notes the widely-differing GHG influence calculation methodologies for LULUCF (Land Use, Land Use Change and Forestry) and the equivalent GWP (Global Warming Potential) for methane, neither therefore providing any plausible basis for imposing future constraints on agriculture. Irish farming uniquely benefits from our temperate climate; for example, Ireland can export milk with one-third of the carbon-footprint of that typically produced in Asia.

Furthermore, at a global level, slightly increased CO2 levels are enhancing photosynthesis and crop yields, helping alleviate continuing under-nourishment in developing regions.

5. Critique of the DECC Climate Action Plan 2021

The DECC *“Climate Action Plan 2021 (CAP21)”* headlines that “the science is undisputable”, which comment paradoxically reveals that the Government is unaware that the opposite is the case. It also claims that “the [extreme weather] effects [are] already clear”; yet if its advisors had fully understood AR6, they would know that most types of “extreme weather” events had not statistically increased in frequency or intensity.

Many of the sectoral ambitions in the Climate Action Plan are laudable, though are unlikely to be achieved in reality. In particular, there lacks an understanding of the engineering realities of energy supply. As large-scale energy storage options will not be viable before 2030, an all-island electricity grid simply cannot be viably powered by up to 80% intermittent renewables.

Nor is there yet, it appears, any realistic understanding in engineering terms of the major grid reconfiguration required to absorb such intermittent generation, while simultaneously providing the significantly increased loading arising from the proposed electrification of both transport and heating. Such major changes will take decades, and will be extremely costly.

Nor does the DECC apparently yet understand the alarming erosion of national energy security relating to the natural decline of the Corrib gas field; it is incomprehensibly naïve, we believe, to ban the construction of an import LNG terminal. Ireland’s current reliance on interconnectors to keep the lights on is already verging on the imprudent, and the situation is virtually certain to lead to energy blackouts before 2030.

Post-2030, new technologies will provide new more sustainable energy generation, storage and usage solutions, and we urge that Ireland should very actively promote such innovation.

6. The Cost of Climate Action for Negligible Benefit

Both the CCAC and DECC Reports are imprecise on the total costs of the CAP21 proposals, with a partial Exchequer costing of €125 billion, to be complemented by unspecified private sector support. It seems that the IMF cost estimate of €200 billion by 2030 may be nearer the mark, though it is seldom explained that this would equate to a cost of around €50,000 per household between now and then, which will not be socially acceptable. The Government has not been sufficiently transparent with the electorate, we believe, on the high costs and on the negligible climate benefit of climate mitigation action, which non-transparency we believe could potentially be legally challenged.

7. Adaptation is the pragmatic Way Forward

To summarise, the ICSF wishes for a sustainable future, but climate/energy policy should not be a knee-jerk reaction to an imagined "climate emergency". Instead, it should be based on rigorous climate science plus economic, engineering and social pragmatism, focused on prudent adaptation to whatever modest climate trends emerge in the coming decades.

Climate/energy initiatives need also to allow due allocation of scarce national economic resources to pressing needs in healthcare, personal wellbeing, housing, infrastructure upgrades, youth unemployment, immigrant support and poverty alleviation, thus providing real social justice in the broader sense.

Above all, it must give our youth optimism for a truly sustainable future, free of eco-anxiety.

Jim O'Brien, Chair ICSF.