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February 8, 2024

**The Environmental Protection Agency,
Johnstown Castle Estate, Co. Wexford, Y35 W821.**

Subject: Getting the EPA Report “Ireland’s Climate Change Assessment (ICCA)” right.

Attention: Ms Laura Burke, Director-General.

Dear Ms Burke,

We have reviewed the ICCA Report and respectfully wish to submit our comments. In essence, we find much of its content to be exaggerated or biased, unfortunately missing the opportunity to deliver objective science and thereby realistic policy advice to our politicians and public. We therefore suggest that the ICCA Report should be re-written to be rigorously objective, as is expected of the EPA..

Essentially, we see the ICCA Report as a copy-paste from the IPCC AR6 report, and as such it suffers from the scientific flaws that we as Expert Reviewers have already pointed out to IPCC itself. Objective science provides no evidence of a climate-catastrophe narrative, as has been demonstrated throughout our ICSF lectures series (see <https://www.icsf.ie/lecture-series>), listed as Appendix A. We reference these lectures in our comments below.

Getting the basic facts right even in the first paragraph in the ICCA Report:

The claim that “*the recent decade was likely warmer than any sustained period in the last 100,000 years*” is both spurious and incorrect. Spurious because most of the last 80,000 years was significantly cooler due to the Milankovitch and other solar cycles, incorrect because there is evidence from multiple sources that the Mid-Holocene, particularly during the Minoan warming, was warmer than now^[11,13].

The claim that “*atmospheric GHGs are higher than at any point in millions of years*”, while true, is biased, as Paleoclimatic reconstructions demonstrate a Cambrian-era CO₂ atmospheric concentration of up to 7000ppm, 15 times higher than now, notably with a global temperature much less than now. The Paleoclimate demonstrates no discernable link between temperature and CO₂ variations^[5,11,13].

The claim that “*the rate of global sea level is accelerating*” is untrue, arising from a spurious analysis of tide-gauge and satellite data, neither of which independently demonstrates any acceleration of significance. Even the somewhat higher satellite data infers a sea level rise of max 25cm by 2100, which is insignificant^[19]. The sea level crisis narrative is exaggerated in the ICCA Report.

Getting the Climate Models right:

Unfortunately, the ICCA Report relies throughout on IPCC AR6 models which are now proven to “overheat” temperature rise scenarios by a factor of 2-3, thus promoting the climate-catastrophe narrative^[3,7]. The ICCA Report includes estimates of up to 2.77°C above 1976-2005 by 2100, that is, nearly 4°C above pre-industrial. Such exaggerated projections are demonstrably unreal.

There are now multiple independent ECS estimates of less than 1.5°C^[1,3,5]. In particular, the pioneering work by the late Professor Ray Bates, which demonstrated an ECS of only 1°C, see “*Estimating Climate Sensitivity using Two-Zone Energy Balance Models*”, JR Bates, *Earth and Space Science*, 3, 207-225, doi:10.1002/2015EA000154, 2016. The IPCC and ICCA Reports have erroneously ignored multiple lines of evidence of low climate sensitivity. Therefore the IPCC, and hence the ICCA, models do not provide a reliable basis for prudent policymaking.

Getting the Climate Models right (continued):

In recent research, Professors Will Happer and William van Wijngaarden have simulated the actual emission spectra of GHGs in the atmosphere, and have proven these simulations correct by satellite measurements, see list of their papers in Appendix B. Their most recent research has also modelled the impacts of clouds. They have shown that the GHG influence of CO₂ is now approaching saturation, so doubling of pre-industrial GHG level of 280ppm to 560ppm by 2100 would imply only about 0.5°C further rise due to the anthropogenic influence^[2,17,20,27]. This research demonstrates no evidence of a “climate crisis”.

In particular reference to agricultural emissions, Happer/van Wijngaarden have now proven that the warming from nitrous oxide and methane is an insignificant 0.1°C/century^[20,27]; the essence of their simulation is that while methane and nitrous oxide are powerful GHG alone in dry air, in a real-world moist atmosphere their emission spectra are already covered by water vapour. These findings demolish any argument towards constraining Irish agriculture; rather the opposite, in the context of the ideal temperate Irish climate for agriculture.

Looking to the evolution of global temperatures, ongoing satellite observations confirm an average rate of temperature rise over the last 45 years of just on 0.15°C per decade (as some combination of GHG and natural influences), pointing to possibly up to 1°C further rise by 2100^[4,18,21]. It would then be reaching a temperature similar to those of the Minoan, Roman and Medieval Warming Periods in which civilizations thrived^[13]. Current warming is therefore not unprecedented and again presents no evidence of a “climate emergency^[8]”. The arbitrary Paris Agreement 1.5°C limit will inevitably be exceeded as the earth thankfully recovers from the Little Ice Age, one of the coldest periods in recent millennia.

Finally, the ICCA Report fails to mention that the slightly increased global CO₂ levels are actually enhancing photosynthesis and thereby global crop yields. Far from CO₂ being a “pollutant”, the slightly increasing atmospheric CO₂ level is assisting in the essential global food supply. Satellite data on the Leaf Area Index, recorded since 1980^[7,27], demonstrably shows continued significant greening of the earth in most regions. Global cereal production is at record levels.

Getting the Climate Observations right:

The ICCA Report refers to supposedly catastrophic global mean sea level rise through inappropriate analysis of tide-gauge and satellite data. One hundred years of real-world tide gauge readings indicate a linear rate of rise of only 1-2 mm/year, while some 30 years of satellite altimetry data indicates a linear rate of rise of about 3mm/year, neither dataset showing evidence of acceleration^[19]. Even taking the higher satellite figure implies max 25cm further rise by 2100. Ocean “acidification” is a non-issue^[22].

Irish sea level data was examined by the late Prof Ray Bates and Peter O’Neill in responding to a Dublin City Council consultation. While the sea level rate of rise in Dublin from 1938-2015 was 1.67 mm/y, in good agreement with the global average, they found that recent data appeared unreliable, needing further investigation, see: <https://oneillp.wordpress.com/2021/04/06/dublin-sea-level/>.

So-called “extreme weather events” are exaggerated in the ICCA Report. The IPCC AR6 WG1 Report indicated no evidence of increasing trends in flooding, drought (meteorological or hydrological), wildfires, tropical cyclones, winter storms, thunderstorms, tornadoes, hail, lightning or extreme winds, though with some evidence for increasing heat-waves, heavy precipitation and droughts (ecological and agricultural), not surprisingly, given a mildly warmer planet^[9]. Most “unprecedented” events are not so in reality when objectively analyzed against past decades^[6]. We actually live in times of an extraordinarily benign climate, as documented in Prof H H Lamb’s classic “*Climate, History and the Modern World*”.

Similar exaggeration also surrounds trends in the cryosphere. The Arctic minimum summer ice has remained stable over the last 17 years, and the Greenland ice sheet status has also remained stable; both were notably warmer in past centuries. Antarctic sea ice is also now broadly stable, having grown since 1979. Glacier retreat regularly reveals vegetation and artefacts from previous warm periods^[13].

And, finally, getting Policy-Making Right

The ICCA Report mitigation mantra for “*deep, rapid and sustained emissions reduction*” is not technically, economically or socially achievable^[12], and would have imperceptible impact on climate as Ireland represents only 0.1% of global emissions. The COVID-19 pandemic reduced global CO2 emissions by 6% in 2020, which reduction had negligible influence on the global atmospheric concentration, and by implication, had negligible influence on climate. Getting to global Net-Zero by 2050 (if ever possible) was estimated by McKinsey to cost \$275 trillion, implying that each \$1bn spent would save only one four-millionth of a degree Centigrade^[21]. Meantime, in the real world, global emissions, particularly in Asia, will continue to rise at least until 2030 as their economies prosper.


How can the ICCA Report suggest that Ireland should go into “degrowth” for no valid reason – why should Ireland forfeit the economic success it has achieved in 100 years of independence? Why is the thrust of the ICCA Report one of scaremongering based on exaggerated science, threatening the mental health of young (and old)^[23]? Current Irish “climate-driven” policies are already beginning to cause serious economic and reputational damage, and Ireland’s energy security has already become seriously compromised^[10,12,15,24,25,26,28]. Ireland Inc risks losing its first-world status.

The focus, we suggest, should therefore move to providing guidance on prudent adaptation to whatever modest changes occur in the Irish climate in the coming decades. This adaptation needs to be based on objective science and rigorous engineering. Investment also needs to be pragmatically based on a growing and aging population. The shopping list should focus on flood control, coastal protection, investment in energy, water and wastewater infrastructure, more investment in housing and retro-fitting, further development of public and private transport and connectivity of all kinds, as well as further investment in the agricultural sector.

Conclusion - Getting the ICCA Report right:

We argue that the ICCA Report, as currently written, is unfortunately providing a disservice to decision-makers and the public, already leading to serious misallocation of national resources. We conclude that the ICCA Report should be re-written to be rigorously objective scientifically, as is expected of the EPA. The ICSF is more than willing and able to assist in that process.

Yours sincerely,



Jim O'Brien, Chair ICSF, www.ICSF.ie, Email: jim@jimobriencsr.com.

CC:

An Taoiseach, Dr Leo Varadkar, TD.

An Tánaiste, Mr Micheál Martin, TD.

Minister for the Environment, Mr Eamon Ryan, TD.

Minister for Finance, Mr Michael McGrath, TD.

About the ICSF:

Founded in 2016, the Irish Climate Science Forum (www.ICSF.ie) promotes realism in climate science and prudence in climate/energy policy. ICSF sees the imperative of informing climate/energy policymaking in the best long-term national interest, without any sectoral vested interests. To ensure objectivity, ICSF is entirely self-funded and receives no funding from any specific enterprise or sector; ICSF has no political affiliations, nor lobbies on behalf of any sector. ICSF cooperates with over 1,800 world-leading multi-disciplinary professionals in more than 30 countries in the Dutch-based CLINTEL think-tank (www.CLINTEL.org), and has with them organised a lecture series by leading international scientists and engineers, see <https://www.icsf.ie/lecture-series>. CLINTEL has published an in-depth rebuttal of IPCC AR6 at <https://clintel.org/the-frozen-climate-views-of-the-ipcc/>.

Appendix A: Reference List of ICSF Lecture Recordings:

Ref	Lecturer, Date	Title, Link
1	Prof Ray Bates , Oct 21, 2020	"Methane Accounting in the EU, its Implications for Ireland – The Good News" https://youtu.be/0bLKBrWMnf0
2	Prof William van Wijngaarden , Nov 25, 2020	"Methane and Climate Change" https://youtu.be/rgP-lwf2tb8
3	Dr John Christy Jan 21, 2021	"Testing Climate Claims – Update 2021" https://youtu.be/D2Cd4MLUoN0
4	Dr Roy Spencer Mar 3, 2021	"Is there a Climate Crisis? Reviewing the Evidence" https://youtu.be/j80PhHJbZcs
5	Emeritus Prof Dick Lindzen Mar 21, 2021	"The Imaginary Climate Crisis - How can we change the Message?" https://youtu.be/GD8SXP02h4c
6	Dr Ross McKittrick May 12, 2021	"Climate Policy – when Emotion meets Reality" https://youtu.be/5oD_WrfxR1Y
7	Prof Will Happer June 23, 2021	"Climate, CH ₄ , N ₂ O and CO ₂ - the Good News for Agriculture" https://youtu.be/o5HYbAkVXuU
8	Dr Steven Koonin Sept 22, 2021	"Unsettling the Science" https://youtu.be/AM4IAAhAf4A
9	Dr Roger Pielke Jr Oct 27, 2021	"What does IPCC AR6 say on Scenarios and Extreme Weather?" https://youtu.be/4wamPyDhwEY
10	Dr Benny Peiser , Dec 1, 2021	"After COP26, with a looming energy crisis, is there a realistic alternative to Net Zero?" https://youtu.be/CmgZmqP5XC0
11	Dr Patrick Moore , Feb 10, 2022	"Fake Invisible Catastrophes and Threats of Doom" https://youtu.be/dII5EgDgRMI
12	Prof Michael J Kelly , March 23, 2022	"The Cost of Achieving Net Zero in Ireland" https://youtu.be/wCaJnZleRlc
13	Tom Gallagher, Roger Palmer. April 20, 2022	"Lessons from Paleoclimate – Conveniently Ignored by the IPCC" https://youtu.be/pj-lu1i317E
14	David Siegel , May 18, 2022	"Get to know the real cause of Global Warming – and zap your Eco-Anxiety" https://youtu.be/-ZQ9ZpkEwr4
15	Dr Lars Schernikau June 22, 2022	"How to Make Future Energy Affordable, Reliable and Sustainable". https://youtu.be/PoCgc-cbC0M
16	Jim O'Brien Aug 31, 2022	"Climate Change – an Existential Threat or Not?" https://youtu.be/RBGSoFNUAul
17	Dr Tom Sheahan Sept 21, 2022	"Methane – the Irrelevant Green-House Gas". https://youtu.be/CqWv26PXqz0
18	Prof Wyss Yim Oct 26, 2022	"Volcanic Eruptions, a Driver of Natural Climate Variability – ignored by IPCC" https://youtu.be/OITIMXR_tSw
19	Prof Ole Humlum Dec 7, 2022	"The State of the Climate – Based on Real Observations" https://youtu.be/nU9UblitEWg

Ref	Lecturer, Date	Title, Link
20	Prof William van Wijngaarden Jan 24, 2023	"Do Agricultural Emissions of GHG Affect Climate?" https://youtu.be/rBI16fV8kms
21	Viscount Christopher Monckton of Brenchley Mar 1, 2023	"The Uneconomics of Net-Zero" https://youtu.be/KGqEhc70Emw
22	Prof Peter Ridd Mar 22, 2023	"World's coral reefs are not declining – proof that the climate censors were wrong" https://youtu.be/9XMB_K9SB20
23	Marcel Crok May 24, 2023	"The Frozen Climate Views of the IPCC" https://youtu.be/dq6XWgXNmbk
24	David Horgan June 19, 2023	"European Energy Policy – Economic Suicide?" https://youtu.be/xgoPuGFeleg
25	Douglas Pollock & Bruce Everett Sept 13, 2023	"Renewables Need Reality-Checks!" https://youtu.be/gvEE0IWg-Xs
26	Dr Samuel Furfari October 18, 2023	"European Energy – Back to the Future of the Past" https://youtu.be/mjhUY3x82tl
27	Prof William van Wijngaarden November 14, 2023	"The Latest Climate Science – Good News for Irish Agriculture" https://youtu.be/ldxoYX_LxGo
28	Dr Benny Peiser December 13, 2023	"Reflections on COP28 – Energy Realism eclipses Climate Alarmism" https://youtu.be/Y_SFI4rbOk4

Appendix B: The Key Happer/van Wijngaarden References:

van Wijngaarden, W. A., & Happer, W. (2020). Dependence of Earth's Thermal Radiation on Five Most Abundant Greenhouse Gases. <https://arxiv.org/pdf/2006.03098.pdf>

van Wijngaarden, W.A. and Happer, W., (2021). Relative Potency of Greenhouse Molecules: <https://arxiv.org/pdf/2103.16465>

de Lange, C. A., Ferguson, J. D., Happer, W. and van Wijngaarden, W. A. (2022). Nitrous Oxide and Climate. <https://arxiv.org/pdf/2211.15780>

van Wijngaarden, W. A., & Happer, W. (2022). 2n-Stream Conservative Scattering. <https://arxiv.org/pdf/2207.03978>

van Wijngaarden, W. A., & Happer, W. (2023). 2n-Stream Thermal Emission from Clouds. <https://arxiv.org/pdf/2301.08129>

van Wijngaarden, W. A., & Happer, W. (2023). Atmosphere and Greenhouse Gas Primer. <https://arxiv.org/pdf/2303.00808>

van Wijngaarden, W.A. (2023). Impact of Changing Greenhouse Gas Concentrations on Ontario's Climate. <https://arxiv.org/pdf/2305.05500>

van Wijngaarden, W. A., & Happer, W. (2023). Instantaneous Clear Sky Radiative Forcings of Halogenated Gases. <https://arxiv.org/pdf/2306.13642v1>

van Wijngaarden, W. A., & Happer, W. (2023). Radiation Transfer in Cloud Layers, <https://arxiv.org/pdf/2310.10622>

van Wijngaarden, W. A., & Happer, W. (2024). Effect of Greenhouse Gases on Thermal Emissivity by Clouds, <https://arxiv.org/pdf/2401.03061>