



Rialtas na hÉireann
Government of Ireland

Climate Action Plan 2024

Public Consultation

May 2024



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1 Introduction

Ireland has set an ambitious national climate objective to achieve climate neutrality by 2050. To support this goal, the government has established a robust framework for climate action planning and implementation. The Climate Action and Low Carbon Development (Amendment) Act 2021 mandates the Minister for the Environment, Climate and Communications to prepare an annual update to the 2019 Climate Action Plan. This update must align with Ireland's carbon budget programme and include sector-specific actions to ensure compliance with carbon budgets and sectoral emission ceilings.

The development of Climate Action Plan 2024 (CAP24) involved a comprehensive and collaborative approach, requiring strong cross-government cooperation, detailed technical analysis, and extensive stakeholder engagement. Sector-specific Working Groups were formed to facilitate this cooperation and collaboration across various government departments and agencies. The plan was informed by the latest reports, studies, and publications from key organizations such as the Environmental Protection Agency (EPA) and Climate Change Advisory Council (CCAC), as well as quarterly Climate Action Progress Reports prepared by the Department of the Taoiseach.

To ensure the plan was based on sound research and analysis, various agencies and research organizations provided technical support. These include the Sustainable Energy Authority of Ireland, the National Transport Authority, Teagasc, and members of the Climate Action Modelling Group. Additionally, external technical services were procured to supplement the expertise available within the government.

Public consultation and engagement were important aspects of the development of CAP24. The National Dialogue on Climate Action (NDCA) hosts a series of events as part of the annual Climate Conversations programme, which help to inform the preparation of the annual update to the plan. Furthermore, a Call for Expert Evidence sought submissions and evidence-based views from expert stakeholders, academic institutions, researchers, and analysts in relevant sectors. These submissions and views formed a vital input into the preparation of the plan.

In 2023, the Department of the Environment, Climate and Communications (DECC) commissioned a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) of the draft CAP24. These assessments informed the finalisation of the Plan, ensuring that it takes into account potential environmental impacts and is in line with relevant environmental regulations.

The development of CAP24 was a comprehensive and inclusive process that brought together expertise from across the government, academia, and stakeholder groups. This collaborative approach ensured that the Plan is based on the best available evidence and is well-positioned to support Ireland's transition to a climate-neutral society and economy by 2050.

Public Consultation Exercise

In line with the requirements for developing a plan of this nature DECC sought the views of the public on both CAP24 and the Strategic Environmental Assessment and Appropriate Assessment. The public could make submissions through an online consultation platform, email, or post.

DECC commissioned Ipsos B&A, an independent research consultancy, to manage the process, collate the responses and report on the key findings from the exercise.

Submissions could be made regarding the overall Plan, specific chapters within it, or both. The public could provide general observations or respond to specific questions set out by DECC. The consultation was open for submissions for a period of 6 weeks, with the closing date being 5th April 2024.

DECC sought general feedback on three main questions related to the Climate Action Plan 2024 and its Annex of Actions:

- Overall views on the Plan;
- Clarity of the Plan's ambition and how it seeks to achieve its goals and objectives;
- Suggestions for improvements in future updates to the Plan.

The public could also provide feedback on individual chapters within the Climate Action Plan 2024. For each chapter, up to five questions were asked, covering topics such as key challenges/risks, additional supporting actions, alignment with Ireland's Just Transition Policy Framework, specific improvements, and prioritization of measures/actions.

Additionally, the public could share their views and observations regarding the Strategic Environmental Assessment or Appropriate Assessment through a dedicated section of the online portal, email, or post.

A total of 98 submissions were received as part of the consultation exercise:

- 75 submissions were made on behalf of an organisation;
- 21 submissions were made personally by individuals;

- 2 submissions were made that covered both organisational and personal views.

Presentation of results in this report

This report provides an overview of the submissions based on analysis conducted by Ipsos B&A. The structure of the report follows that used in the online submission portal. The first section presents results from the initial questions asking about CAP24 in its broadest sense - general views on the plan, clarity of ambition and goals, and suggestions for future improvements. The following sections provide feedback on individual chapters and the Strategic Environmental Assessment.

Analysis is only conducted if at least ten submissions provided specific feedback in that area. If fewer than ten submissions were received relating to a particular chapter then a summary of each individual response is presented directly in the report. For example, only five submissions provided feedback on the chapter relating to Adaptation, so a summary of those responses is included in the report without any analysis or interpretation.

2 General views on CAP24

When completing the consultation exercise, respondents were first asked to provide their general views on the plan. Respondents were free to provide whatever information they wished (up to a maximum of 500 words), and were not given any guidance on the nature of their response. As such the responses included wide-ranging feedback (both positive and critical) from a broad spectrum of stakeholders.

In summary, the submissions affirm and support the intent of CAP24 but make the claim that stronger ambition, vision, incentives and societal engagement are essential to transform positive aspirations into decisive action. Criticism includes that current trajectories fall well short of those required for Ireland to contribute its fair share towards abatement, and urges more radical action to address the scale of the climate emergency challenge.

Overall support, but critical of ambition

There is broad endorsement of the intent and direction of CAP24, insofar as it furthers the evolution of Irish climate policy, with many welcoming the ongoing refinement of measures building on previous climate plans to reduce emissions and transition towards carbon neutrality.

However, a common theme cutting across responses is that the depth and pace of transformation in the Plan does not fully match worsening climate projections or Ireland's obligations in addressing the increasing challenge. Many contend that the level of ambition

and obligations still fall appreciably short of achieving mandated 2030 emissions reductions, and there is a strong desire for more radical near-term actions, higher targets, prioritisation of the most impactful measures, and greater policy coherence.

A number of external factors such as increasing the number of data centres in Ireland and growth in immigration were highlighted as contributory factors to a worsening of the problems faced by Ireland. It was suggested that future iterations of the Plan will need to address how to mitigate against these factors in meeting Ireland's obligations.

Emissions reductions are off-track, and significant progress depends upon considerable technological progress

A consistent critique centres on Ireland's lack of tangible progress in reducing greenhouse gases - current trajectories forecast missing 2030 targets even with full execution of agreed measures. Some submissions highlight doubts about the feasibility of some changes and yet-to-materialise or unproven technologies underpinning planned reductions.

Certain submissions claim that some sectoral emissions ceilings are overly generous. There are demands for explicit plans to curb energy demand growth and decisively phase out fossil fuel usage in power generation, heating, and transport.

Investment, incentives, employment, and the Just Transition

The extensive societal transformation that is required to deliver on the ambition of the Plan prompts discussion around resourcing such a transition. Frequent mentions appear urging clarity on the budgets, investment sources, fiscal incentives and market frameworks needed to drive and reward climate action by businesses and households. These also need to be considered in the context of a broader range of crises on different fronts (energy costs, immigration, cost of living etc.) and the extent to which they limit the ability and scope for major change.

Just transition considerations feature prominently with multiple calls for assessments of employment impacts; both potential job losses in carbon-intensive sectors and opportunities in emerging green growth areas. Comments call for enabling communities to actively participate in and benefit from the low-carbon transition. Of particular focus in this regard are rural communities where it is felt that cynicism towards climate action may limit desire to take meaningful steps.

Policy coherence and governance

Another common theme relates to enhancing governance mechanisms and policy coherence to successfully coordinate complex multi-year action across multiple pillars. There

is a desire to clearly link initiatives across sectors and provide detailed roadmaps on priorities issues such as transportation, energy supply, reorienting agriculture, etc. Others seek to align strategies for climate action with health, biodiversity, transport, and regional development.

The feedback notes modest progress towards improving climate governance but stresses the need for a robust continuous review processes.

Technologies and measures needed to achieve targets

Submissions deal with choices around technologies and action measures. Some urge caution against an over-reliance on emerging, but unproven, solutions, while others argue for being more expansive around technological options.

Of particular note is some pushback on plans predominantly focused on electrification, due to grid stability and land use concerns regarding the scale of renewables (solar and wind) required. Instead, suggestions include demand management, energy storage, converting existing generators to biofuels, etc.

Enhanced local engagement, particularly with rural and vulnerable communities

While increased emphasis on local authority involvement garners approval, submissions contend that more direct community participation and supports are essential for broader acceptance and support for the action needed. Rural communities particularly highlight feelings of exclusion from renewables planning process and lack of transparency around impacts. Submissions warn that rural groups can perceive energy policies as imposed hardships rather than climate imperatives, and overcoming this will need to integrate climate action with addressing inequality and deprivation to provide co-benefits that in turn will drive support.

Communication and accessibility of climate action

A number of submission highlight failures in communicating climate issues and policies to citizens in accessible language. It is noted that the plan itself is impenetrable to a wide audience due to complex language and reliance upon technical terminology.

Recommendations call for simplified materials and much greater national education and awareness campaigns tailored to different audiences on risks, lifestyle changes expected, reducing consumption, etc. Others advocate for linking climate action to health impacts, arguing that policy must stress the health co-benefits of mitigation measures to increase public buy-in.

Clarity of ambition and goals

The second question that respondents to the consultation were asked was: *Is the plan clear in its ambition and how it seeks to achieve its goals and objectives?* Again, respondents had freedom on how to respond to this question, and were allowed to provide a submission of up to 500 words.

The overall ambition of CAP24 is informed by the Climate Action and Low Carbon Development (Amendment) Act 2021 which sets the target of reducing overall greenhouse gas emissions by 51% by 2030 relative to 2018 levels and achieve net zero emissions across all sectors by no later than 2050. These are consistent with Ireland's commitments under the Paris Agreement and European Green Deal.

The submissions noted that the vision of CAP24 is necessarily ambitious, and based on current trajectories will be difficult to achieve. Further challenges exist in achieving consensus on granular sectoral pathways, and a reliance upon unallocated emissions savings.

Aligned with goals, but needs to be adaptive

While several responses positively noted alignment between the CAP's objectives and broader national, EU, and international climate goals, a number called for a clearer roadmap and linkages with other frameworks. Some welcomed efforts highlighted in the CAP to support collective climate action across the EU, though others cautioned that targets should be realistic, achievable and adaptive based on the latest data rather than arbitrary.

Clarity of sectoral pathways

Many submissions felt greater clarity was needed on sector-specific (and cross-sectoral) decarbonisation pathways across key emitting industries such as power generation, transport, buildings, agriculture, and waste. Concerns were raised about uncertainty around the pace and feasibility of delivering absolute emissions reductions particularly in agriculture and aviation.

Generally, a need for detailed, quantitative impact assessments of all major policies and measures was highlighted in this respect.

Credibility concerns around unallocated emissions savings and unproven technologies

CAP24's reliance on unallocated emissions savings and emerging technologies was flagged as a credibility threat by stakeholders. These were felt to be ambiguous and uncertain in the overall development of a meaningful roadmap, so were best avoided in this respect.

Suggestions for improvements

Before progressing to providing feedback on individual chapters, respondents were asked *“In what ways could future updates to the Climate Action Plan be improved?”* As with previous questions they were not provided with further information and were free to provide feedback up to 500 words.

The recommendations addressed perceived shortcomings in the strength of public engagement, accountability in taking actions, and overall ambition. Stakeholders called for a more accessible and engaging Plan, with suggestions for plain English versions and community-driven actions. There was a demand for increased transparency and accountability through oversight committees, annual reviews, and quantifiable metrics. The need for accelerated action is emphasised, including emissions reduction across sectors, offshore wind development, agricultural diversification, and easier retrofitting processes. Stakeholders also highlight the potential co-benefits of climate action, such as sustainable job creation and improved public health, urging streamlined processes to maximize these benefits.

A meaningful and proactive approach to public engagement

One of the criticisms of the current CAP is that it is presented in a way that is inaccessible to many interested parties, particularly those with limited technical or environmental knowledge, and presented as a finalised document for feedback. There were a number of suggestions that the consultation should occur at an earlier stage in the development of the Plan to enable a broad spectrum of stakeholders to provide input. Additionally, the document itself can seem overwhelming and difficult to engage with, and a suggestion was made that the ambition for the next CAP should be to produce it in a way that everyone in the State can engage with it and understand the ambitions, goals and progress detailed within it. This could include plain English versions and simple one-page summaries.

It is also noted that this needs to be reflected in the broader engagements with the public through more focus on, and funding for, community-driven actions, as well as education through school curriculums and initiatives such as action weeks, both locally and nationally.

Improved accountability mechanisms

A recurring theme is the demand for greater transparency and clarity of responsibility for delivery of Climate Action Plan actions. Submissions request the establishment of oversight committees, annual accountability reviews, KPIs, and potential penalty systems to drive urgency at government level on meeting the objectives. Quantifying costs, benefits, employment impacts, and implications of delays is also highlighted as an area requiring improvement.

Accelerated roll-out of actions needed to make necessary progress

One of the key pieces of feedback from stakeholders is the need for increased ambition in order to achieve the stated targets, particularly within a perceived worsening context both within the climate crisis and more broadly in other aspects of society and geopolitics. To mitigate against this it is recommended to take large strides now across a broad range of areas, including emissions from different sectors, rollout of offshore wind, diversification within the agricultural sector and removal of remaining barriers to retrofitting.

Radical approaches across a broad spectrum of activities – supported by clear investment plans – are called for in order to make meaningful progress.

Realising the variety of co-benefits that can materialise

In addition to emphasising the importance of decarbonisation, submissions articulate climate action as an opportunity space to simultaneously enhance multiple societal goals, from generating sustainable enterprises and jobs to enhancing communities' health and natural assets. Streamlining bureaucratic processes and fostering inter-agency collaboration to map and maximise these potential dividends across government policies is highlighted by numerous stakeholders.

3 Feedback on Specific Chapters

3.1 The Critical Nature of the Challenge

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- There is a need to address how we came to this crossroad in the first place - who (what sector/s) is driving the ever increasing race of technological changes that causes the main reason for climate changes and who actually benefits from this ? I.e.

tech industries and global companies. And what is the price the natural world pays for this drive to increase human's uncontrollable, devastating consumption rate?

- How to change people's expectations and behaviour?

Proposed supporting actions for 2024

- No feedback was provided in relation to this topic.

Alignment with Just Transition Policy Framework principles

- No feedback was provided in relation to this topic.

Specific suggestions for improvement

- No feedback was provided in relation to this topic.

Views on prioritization of measures and actions

- No feedback was provided in relation to this topic.

3.2 Where We Stand

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- To make it more precise and less lengthy
- GHG reductions are way out of line from where we need to be right now. 1.9% reduction year on year is pitiful. How do you plan to reduce by 75% in electricity by 2030 based on 2018 CO2 levels. It is not indicated anywhere in the documentation how much we will be fined if we miss our targets. The public needs to be informed on this by TV ads or other methods.

Proposed supporting actions for 2024

- No feedback was provided in relation to this topic.

Alignment with Just Transition Policy Framework principles

- No feedback was provided in relation to this topic.

Specific suggestions for improvement

- No feedback was provided in relation to this topic.

Views on prioritization of measures and actions

- No feedback was provided in relation to this topic.

3.3 Policy to Date and Expected Impact of Planned Policies

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- Expected impacts can never be given - too far ahead in time. Actions should be in place now.

Proposed supporting actions for 2024

- No feedback was provided in relation to this topic.

Alignment with Just Transition Policy Framework principles

- No feedback was provided in relation to this topic.

Specific suggestions for improvement

- No feedback was provided in relation to this topic.

Views on prioritization of measures and actions

- No feedback was provided in relation to this topic.

3.4 Research and Innovation

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- LGI has identified a particular need to address research and innovation requirements in the heat and transport sectors.
- Research staff experience a range of institutional and systemic barriers in relation to their work and professional progression and development, from participation in collective bargaining to fair, transparent, and progressive pay scales; from participation in governance and strategic decision-making to disciplinary parity of esteem, and even basic intra-institutional communication and networking.
- Overreliance on individual attitudes, perceptions, and behaviours; lack of sociological perspectives.
- This plan's measures and activities takes absolutely no account of the Sulphur hexafluoride (SF6) - concentrating only on CO2 reduction through research and innovation that is mainly based on technology, will cause overall climate action plans

to fail in the long run. SF6 is one of the 6 most important GHGs already mentioned in the Kyoto Protocol. Its high atmospheric stability and ability to trap infrared radiation means it's far more potent at warming the earth's atmosphere than CO2 over longer periods of time. It is 23,500 times more potent than CO2, it is accumulative, does not disintegrate naturally and has a life-span of a minimum of over 3000 years (in comparison to CO2 which has a maximum of 1000 years). SF6 emissions are completely underestimated and underreported in emission data in Ireland, the EU and globally. The data for the annual global emissions of SF6 rose 24% between 2008 (7,300 tonnes) and 2018 (9,040). As SF6 is cumulative, SF6 emissions by 2018 were a minimum of 75,000 tonnes (9,000 tonnes of SF6 = approx. 44 million passenger vehicles driven for one year (440 million passengers by 2018)), or 103 million tonnes of coal being burned (1030 million tonnes in 2018). That estimate does not take into account the emissions since the beginning of its usage and from 2018 to 2024.

- Emissions of SF6 occur through leaks over the lifecycle of electrical equipment, and can be released during the equipment's manufacture, installation, maintenance or decommissioning, etc.
- As long as CO2 usage is being replaced with wind and solar farms and other technologies/innovations that uses SF6, no climate action plan will succeed. Replacing CO2 with a gas that is 23,500 times more potent with regards to climate change impact is futile.
- Priorities. Timelines are loose. Actually sticking to the plan.

Proposed supporting actions for 2024

- Invest in research and development around advanced biofuel feedstocks and production pathways, especially relating to renewable liquid gas value chains. Incentivise indigenous HVO production which can supply BioLPG markets. Support commercialising new processes for bio-propane synthesis from Irish feedstocks.
- Welcomes establishment of new Climate Science and Policy Analysis Unit (RE/24/2) and commitment to increase investment in research on agricultural/land use diversification (RE/24/6). Suggest increasing research on behavioural science, climate finance, and monitoring/evaluation of energy renovation policies. More detail needed on what will be covered under RE/24/6. Given regulatory changes and countries regulating embodied carbon, Ireland should conduct feasibility studies on

potential local low carbon construction materials from agriculture/forestry. Further recommendations for research provided.

- Incorporate practice theory approaches; lend expertise of SAI Environment & Society Study Group to Advisory Group on Social and Behavioural Sciences
- More actions and research on nature-based solutions are needed - especially those that do not rely on electricity and over-consumption of natural resources
- Old or traditional skills have long-lived stability and should not be ignored, but researched and used for alternative innovative solutions
- Focus on key priorities.
- Stakeholders for solutions need to be aligned, in particular government agencies.

Alignment with Just Transition Policy Framework principles

- No feedback was provided in relation to this topic.

Specific suggestions for improvement

- No feedback was provided in relation to this topic.

Views on prioritization of measures and actions

- No feedback was provided in relation to this topic.

3.5 Choosing the Pathways

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- The key measures which eHeat Ireland advocates for include the reduction of the electricity to natural gas unit cost ratio through a temporary support scheme. For example, the Temporary Business Energy Support Scheme (TBESS) could offer a financial payment to encourage the reduction in fossil fuel consumption. Additionally, an introduction of non-firm capacity allocation to avoid capacity constraints is required to accelerate access to the grid for large energy users.
- Ireland has the worst performance in the EU for using renewable energy sources for heating and cooling. The electrification of heat is a sustainable and economic means of generating heat across various temperatures.

- Heat demand for Industry in Ireland accounts for 17.5 TWh or 37% of total demand. The latest data from SEAI indicated that approximately 6.9 TWh of heat demand is for temperatures up to 150°C. The Heat Roadmap Europe project included a division at 200°C for industrial heat and found that 57% of the heat demand in Ireland was <200°C, which equates to almost 10 TWh. Much of this demand can be met by the electrification of heat.
- Low or medium grade heat (<150°C) represents a significant portion of heat demand and is commonly supplied through hot water or steam boilers, or from combined heat and power (CHP) plants. These systems can be transitioned to low carbon electric heat. Typical industrial heat pump applications are used across a broad spectrum of industries including food and beverage, agriculture and fishing, plastics, chemicals, and electronics and MedTech/pharma.
- There is huge potential (>50%) for renewable heat in industry with existing technologies, and heat pumps are the most widespread technology for industrial electrification. Lots of proven examples exist with the planned deployment of 600,000 heat pumps by 2030. Ireland now has an abundance of renewable electricity to utilise, with 12.1% dispatched down in 2020.
- The planned growth in renewable energy must be mirrored in growth in electric heat to fully utilise the resources we have for the benefit of the wider economy.
- To fully exploit the benefits of the decarbonisation of heat through electrification, the regulatory framework must incentivise the transition from fossil fuel fired to electrified heating. Critical to this is ensuring the average unit cost of electricity is never more than double the cost of oil/gas for heating in industry either via taxation or subsidies.

Proposed supporting actions for 2024

- No feedback was provided in relation to this topic.

Alignment with Just Transition Policy Framework principles

- No feedback was provided in relation to this topic.

Specific suggestions for improvement

- No feedback was provided in relation to this topic.

Views on prioritization of measures and actions

- No feedback was provided in relation to this topic.

3.6 Governance

Key challenges and risks identified

The analysis of the responses reveals the following challenges around the governance structures and processes needed to effectively deliver on the Plan's emissions reduction target: lack of central oversight and coordination, the need for strategic stakeholder engagement, and weak cross-departmental collaboration.

The lack of a national oversight body to allocate carbon budgets, evaluate projects, and enforce consistency is viewed as a major gap that risks undermining climate goals. There is a widespread call for rapid development of a central climate governance authority.

There is the view that the Government has inadequately empowered and resourced communities and local stakeholders to meaningfully engage with and input to climate decision making. More support for participation is urged.

Failure to drive collaboration between government departments, agencies, and industry bodies poses a threat to the coordinated delivery of the Plan. Acceleration of supportive forums and taskforces is advised.

Creating clear centralised climate governance, expanding community climate action resources, and actively facilitating public-private sector partnerships emerge as urgent priorities to align interests, participation and delivery capacity around Ireland's net zero transition.

Proposed supporting actions for 2024

There are consistent opinions around the governance supporting actions needed to ensure effective delivery for 2024, especially concerning central climate oversight, cross-agency coordination, delivering key energy policy, and community and industry participation.

Appointing a national body (e.g. SEAI) to allocate emissions budgets, verify offsets, and enforce assessments is endorsed to enable oversight and drive accountability. There is a perceived need to break down government silos through enhanced collaboration.

Streamlining resources and empowering sustained community climate action groups is advised to leverage and support essential localised public engagement. Increased openness around Climate Delivery Taskforces and broader sharing of detailed tracking data is seen as a way to boost productive public/private partnerships.

Finalising the energy storage framework and enabling long-duration and hybrid projects by end 2024 is also urged to provide critical policy certainty.

Alignment with Just Transition Policy Framework principles

The current approach does not sufficiently support communities.

Specific suggestions for improvement

For strengthening governance mechanisms and ensuring effective delivery of CAP24, mandatory emissions approval processes for large projects should be established, and the Climate Change Advisory Council should be given enhanced powers to enforce accountability.

There's a suggestion regarding the introducing of compliance mechanisms and accountability, such as establishing penalties for emissions exceedances and requiring remediation plans from underperforming departments.

Support for community participation was a recurring theme, calling for inclusive governance processes involving communities in partnership with the Government.

Finally, a greater timeline commitment around policy is advised to ensure the timely delivery of critical decarbonisation measures.

Views on prioritisation of measures and actions

Reevaluating ambitions where appropriate is key to sharpening the governance focus within CAP24. Ensuring balanced transition supports across sectors.

3.7 Ensuring a Just Transition to a Climate Neutral Ireland

Key challenges and risks identified

The responses highlight several main areas of concern regarding a just transition to climate neutrality in Ireland. There are worries regarding equity issues, whereas the current approach and policies may be regressive or inequitable across different demographics and locations. Specifically, the uniform national retrofit plan may not suit rural and off-gas-grid areas well. Also, existing subsidies and incentives like free upgrades and motor industry allowances are seen as lacking additionality and accessibility for many groups.

Respondents emphasise the critical need for much broader social dialogue, engagement, and consultation with marginalised communities and persons with disabilities to truly deliver an inclusive just transition. There is a call for meeting Ireland's Convention on the Rights of Persons with Disabilities (CRPD) obligations in this context.

Some point out the inherent conflicts between the dominant economic ideology built on consumerism and endless growth versus the ecological constraints for sustainability.

Tackling those deeper ideological differences is viewed as an essential part of the transition

process. Concerns are raised that the financial divide between the poor and the rich as well as corporations versus Irish enterprises will continue to grow, undermining social justice aims. Reliance on international companies, rather than fostering Irish alternatives, features in these worries too.

Proposed supporting actions for 2024

The suggested supporting actions focus on enhancing the equity, inclusiveness and accessibility of the transition process. Responses include reviewing and expanding eligibility criteria for free upgrades to improve additionality and access for vulnerable groups like House Assistance Payment (HAP) tenants; using mechanisms such as income-based sliding scale grants and green public procurement to incentivise sustainability skills and training; and utilising Pobal data to direct resources towards equitable access.

Expediting the establishment of a Just Transition Commission and embedding sustainable procurement and stakeholder collaboration at the local level are also put forth. More broadly, there are calls to structurally embed just transition principles and guidelines into the mandates of all public bodies and regulators.

Responses emphasise the critical need to urgently and meaningfully consult with marginalised communities and persons with disabilities, in line with Ireland's obligations under the CRPD.

In terms of technical solutions, transition support is proposed for renewable ready gas boilers running on LPG/BioLPG blends. Harnessing surplus renewable energy to assist homes in fuel poverty is another specific action suggested.

Alignment with Just Transition Policy Framework principles

The Irish Green Building Council suggests that “changes proposed would contribute to equitable impacts and right skills principles”.

Specific suggestions for improvement

Specific suggestions for improvement include that current policies like the national retrofit plan should suit all demographics and areas well. Calls are made for broader social dialogue, urgent consultations with marginalised groups per CRPD guidelines, and embedding just transition principles across institutions. Proposed actions focus on expanding eligibility criteria for upgrades, utilising data to direct resources equitably, assessing equality impacts, increasing green spaces in disadvantaged areas, and harnessing renewables to tackle fuel poverty in a time-sensitive way. There is an emphasis on supporting mixed technologies, shared costs, developing stakeholder skills, and structured approaches that distribute impacts fairly. The overarching suggestions are for

frameworks and processes enabling fair, inclusive and empowering transitions rather than top-down prescriptive measures.

Views on prioritization of measures and actions

Priorities outlined in the responses are to integrate just transition principles, maximising employment opportunities and collaborating with impacted groups, into all climate policies and measures. This requires urgently setting up the Just Transition Commission for monitoring and oversight during implementation. Meeting legally binding obligations under the CRPD to disability-proof policies and consult with persons with disabilities is also regarded as an equivalent priority to fulfilling other climate commitments in the plan. Additionally, specific mention on alleviating fuel poverty for vulnerable families is highlighted as warranting dedicated prioritisation in the transition process.

3.8 Delivering a Just Transition in the Midlands Region

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- Good communication with local communities to resolve fears. Regenerative tourism and place-making is key, and engagement with local communities so that they are informed about concepts and in turn, inform plans and strategies for their places. Covid-19 has meant that people have engaged more with nature, and there is a general understanding in communities that people must move on from peat harvesting.
- The Midlands is not a showcase for how we manage or deliver a Just Transition. It is rather a case study in how not to manage the process, with responses and supports delivered in a reactive manner and after the most significant damage had already been done.

Proposed supporting actions for 2024

- Welcomes support for piloting, demonstration, and innovation for a sustainable and circular bioeconomy (JM/24/3). In addition to timber and afforestation, government should explore options for production of other biobased construction materials to diversify agriculture, reduce emissions from industry and agriculture, and create jobs. This could start with a feasibility study on materials like CLT, industrial hemp, straw etc. Significant state involvement would likely be needed to develop these industries.

- Linking regenerative ideas and climate action to socio-economic and 'landscape' health.
- Funding remains a major concern. Support provided via the National Just Transition Fund was not targeted or focused on the most impacted or affected communities and workers, but spread over a wide range of disparate and often unrelated areas. Most worrying is that funding was not based or linked to any hard data re job creation, job quality or impact in the areas most affected. The EU Just Transition Fund betrayed a similarly worrying detachment from hard analysis and assessment of how best to target and deliver resources. On what basis, for example, was the decision made to award a huge tranche of the available monies to Failte Ireland? On what study, plan or proposal was this based? This is a particular concern given the generally low quality of jobs created within the tourism/ hospitality sectors. As a result, the funding provided is very likely to be seen as a major opportunity missed in the years to come. The aversion to evidence-based policy making inherent in these processes are a major concern and must be addressed into the future.

Alignment with Just Transition Policy Framework principles

No feedback was provided in relation to this topic.

Specific suggestions for improvement

- Suggestions about exploring biobased construction materials beyond just timber, to align with the principles of developing a sustainable bioeconomy and agriculture/industry diversification.
- More Wilderness Corridors linking re-wetted, re-wilded and re-forested former peatlands along active travel routes between renewable energy production sites. More regenerative tourism and place-making strategies.

Views on prioritization of measures and actions

No feedback was provided in relation to this topic.

3.9 Citizen Engagement

Key challenges and risks identified

The engagement challenges mentioned are knowledge gaps, apathy or fatigue, and difficulties translating concern into meaningful action. There is a sense that policy ambition has outpaced understanding and motivation within the general public. Participation often centres on one-way information flows rather than empathetic dialogue or community co-creation. Those working closest with climate issues warn that relying solely on

communications and awareness raising will not suffice. Practical assistance, behavioural incentives, and removal of structural barriers may do more to enable citizen-led initiatives. Feedback suggests environmental networks deserve greater investment and appreciation for their role in driving grassroots progress.

Proposed supporting actions for 2024

The feedback focuses heavily on improving public awareness, engagement, and education around climate issues. There are calls for more innovative and empathetic communication efforts to avoid condescension. Developing consistent, relatable messaging and narratives is seen as critical to driving understanding and motivation. Research into behavioural barriers and solutions is advised to inform engagement strategies. Providing practical infrastructure, incentives and supports to empower action is also highlighted as important by multiple respondents. There is a sense that community participation must move beyond information sharing into spaces for public debate, consensus building and grassroots initiatives.

Regarding business engagement, recommendations centred on providing training, expert advisors and clear guidance to help firms, especially SMEs, understand expected climate contributions and paths forward. For youth, participatory education models that promote climate literacy and leadership were strongly encouraged.

To raise wider societal awareness, there is the suggestion to link building, transport, and industry actions into a coherent cross-sector narrative on climate progress. Assemblies, research efforts and educational campaigns should aim to clarify connections, build consensus, and combat misinformation.

Alignment with Just Transition Policy Framework principles

Some comments in relation to the alignment with Just Transition Policy Framework principles mention the importance of equipping people with skills for a net zero economy, the initiative of redistributing carbon tax revenues to lower income households, as well as the need to create a framework for green retrofitting peat-burning households.

Specific suggestions for improvement

The suggestions focus on boosting climate literacy and countering misinformation through comprehensive government-led education efforts and communication strategies. Capturing public imagination and cooperation is deemed critical, with reference to previous COVID-19 campaigns as examples to emulate. Emphasising interconnectedness across climate issues and societal actors is advised to highlight the need for collaborative action, and there are calls to increase financial, technical and social supports to minimise barriers for vulnerable

groups. Expanding initiatives like the National Youth Assembly to involve more young people will further enable engagement.

Other key suggestions for improvement give specific advice on providing resources for community-led water monitoring, annual Earth Hour campaigns, messaging that inspires collective mobilisation, utilising networks for broader reach, reviewing grants, and introducing structures to ease household transitions.

Views on prioritisation of measures and actions

Public communication and education are seen as priorities to achieve behaviour change and reduction of emissions. Funding of climate literacy programs should also be prioritised with ECO-UNESCO education programs being mentioned as examples.

3.10 Public Sector Leading by Example

Key challenges and risks identified

The feedback highlights several key challenges faced by the public sector in leading climate action. A common theme across the responses is the difficulty in retrofitting older public buildings to improve energy efficiency while maintaining essential public services and managing impacts on staff. Specific challenges raised include managing waste from single-use items in healthcare settings, high costs and installation issues with transitioning to heat pumps, particularly in rural areas, and capacity constraints in harnessing resources to invest in decarbonisation. There is a risk that rural communities may be left behind due to a policy focus on cities.

Overall, the responses call for greater leadership from government and local authorities to “walk the talk” on sustainability and climate initiatives. There is a perception that more accountability is needed for public organisations to reduce waste and embed climate considerations across operations and decision-making.

Proposed supporting actions for 2024

Supporting actions are proposed for several areas where the public wants to see expanded climate action from the public sector. There are calls for stronger accountability measures on equity, reduced waste, increased investments in staff training and capacity building, and more ambitious sustainability standards for public procurement and buildings.

On gender and social equity, there is a call to collect domestic data on how climate change impacts groups differently based on gender, recognise unpaid care work as a contribution to climate action and ensure equity is considered in policymaking.

Provide incentives and supports for public housing upgrades to use renewable ready gas boilers and bio-LPG blends. Mandate higher sustainability standards for buildings funded by the Government.

Build technical, regulatory and administrative capacity across the public sector through recruitment and training programs, and establish partnerships with industry to address skills gaps.

Implement stronger accountability measures for public bodies to reduce waste, protect nature and water sources, and adhere to sustainability best practices. Explore new mandates for planning agencies. In the Health sector, waste is a concern and single-use plastic restrictions could be extended to clinical settings, aligning with objectives in the HSE's Climate Action Plan.

Alignment with Just Transition Policy Framework principle

The responses advocate for proactive skills mapping across impacted industries, enabled through social dialogue. This would produce learnings to inform education and reskilling policies, supporting a just, inclusive transition. There is also concern that the Just Transition Commission should ensure gender equality.

Specific suggestions for improvement

To enhance public sector climate leadership, one of the responses indicate that the public sector chapter could benefit from being separated into more specific subgroups to allow for tailored guidance based on the diversity of public bodies and services provided. The suggestion is having the following split: Public Sector, Schools and Higher Education Institutions, and Commercial Semi-States.

Some responses call for increased resourcing for climate action delivery, modernisation of administrative processes, and consideration of lower carbon heating solutions for public buildings beyond electrification such as renewable ready gas boilers.

Sufficiently resource the various public bodies tasked with enabling climate action delivery through skills, technology, staffing, and efficient digitised processes.

Views on prioritization of measures and actions

In terms of priorities in relation to the Public Sector chapter, there is an emphasis on prioritising actions that deliver emissions reductions in the short-term to ensure the 2030 targets are achieved. At the same time, the resources and capacity required to meet increasing sustainability reporting and target requirements must be balanced. There is

specific recommendation to accelerate progress by incentivising sustainable aviation fuel (SAF) production to enable aviation decarbonisation.

3.11 Carbon Pricing and Cross-Cutting Policies

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- Notes inflation creates barriers to business investment in sustainability.
- Affordability of cleaner, lower carbon energy solutions for rural households and businesses.
- Lack of understanding of long-term impacts of remote working on consumption and environment.

Proposed supporting actions for 2024

- Suggests tax policies and financial incentives to encourage EV adoption, retrofits, renewable energy investment. Proposes VAT reduction on sustainable goods, leadership on green finance.
- Provide appropriate supports for renewable ready gas boilers as a more cost-effective lower carbon option and incentivise the production and use of BioLPG which is exempt from carbon tax.
- Welcomes Green Budgeting analysis on tax/expenditures (CP/24/2, CP/24/3) but in a climate emergency this needs to go further - ensure all government expenditure and fiscal policies fully align with 2030/2050 climate targets. Positive that climate action is a key driver in National Planning Framework (NPF) revision. Must ensure NDP construction activities fit within carbon budget. Findings from Construct Innovate funded Viable Homes project should inform NPF revision.
- Conduct research on potential rebound effects of remote working; extend worker protections to remote workers.

Alignment with Just Transition Policy Framework principles

No feedback was provided in relation to this topic.

Specific suggestions for improvement

- Calls for simplification and promotion of accelerated capital allowances scheme. Recommends review of schemes like EIS and R&D tax credit to facilitate green investments.
- Publish detailed carbon tax/fuel duty escalator roadmaps out to 2050 to aid planning by individuals and businesses. Accompany tax measures with expanded financial supports to aid transition. Reassess motor and carbon tax rates annually based on progress to 2030 EV sales targets. Extend EV purchase incentives to used imports to broaden access.
- Expand financial incentives for renewable heating technologies to renewable ready gas boilers.
- Suggestions include aligning all expenditure with climate targets, measuring/prioritising NDP activities based on carbon impact, and using Viable Homes guidelines to inform NPF revision.

Views on prioritisation of measures and actions

- Seeks engagement by DECC with Waste to Energy operators on impact assessment of Waste to Energy in EU Emissions Trading System to shape landscape for carbon capture initiatives and ensure informed decision-making.

3.12 Electricity

Key challenges and risks identified

In relation to the Electricity chapter, the answers received outline the missing renewable electricity targets and slowing renewable rollout compared to EU countries as one of the main challenges or risks. There is the concern that without acceleration, Ireland risks missing specific 2030 production targets. There is mention of the important role of electric vehicles in achieving the target and how the transition to EVs is needed locally as well as the rollout of electric vehicles in the commercial and freight sectors; without these it is believed that Ireland would be risking progress on emissions reductions.

Market and regulatory issues are of great concern. It is believed that administrative barriers hinder flexible technologies, that there is a lack of financial incentive to an electricity balancing market, and that the current market structure (penalties and charges) results in fossil fuel asset dependence.

Stronger policy support and incentives are needed to increase renewable energy project deployment rates. Increased policy is needed with emphasis on energy efficiency,

supporting flexible technologies that can potentially minimise the curtailment of renewable energy, and reducing unnecessary electricity demand growth from data centres and other users.

This is related to another challenge identified: capacity constraints. The lack of electricity grid and transmission infrastructure capacity might lead to renewable generation curtailment and there is potential for over 20% of renewable generation to be curtailed by 2030 if no action is taken. Where there is a significant projected growth in electricity demand there is the risk of outstripping renewable generation growth and energy efficiency gains. And while there is the ask to utilize alternative sources of power like nuclear power and natural gas there is concern that over-reliance on uncertain new technologies rather than specific measurable actions could pose a risk to production. Further investigation on what drives the demand up is also needed to ensure the plan is sustainable. Finally, it is important to consider the unintended consequences that each alternative technology represents, for instance, relying on wind turbines as a primary source of renewable energy requires careful consideration as it can impact wildlife and have cascading effects on ecosystems.

Proposed supporting actions for 2024

In terms of proposed supporting actions for 2024, the most common recommendations include accelerating roll out of renewable electricity generation such as offshore wind, solar PV, biomethane, and green hydrogen to reduce reliance on fossil fuels and increase energy independence. There are also frequent suggestions around upgrading and enhancing grid infrastructure including storage capabilities to support growth of renewable generation and overall system flexibility as well as identifying grid bottlenecks. Key barriers around planning processes, guidelines and market design should be addressed to enable faster scaling of renewable projects with recommendations to utilize EU regulatory mechanisms to accelerate planning.

The submissions also call for developing frameworks and incentives to mobilize investment into renewable electricity developments including via Corporate Power Purchase Agreements and to establish renewable cluster zones for focused growth. Progressing sector coupling of electricity with heat, transport and industry is recommended including measures like developing district heating networks, electrification of transport, Power-to-X. Empowering consumers with smart technologies, real-time data access and options to manage energy consumption and bills as well as accelerating smart meter rollout and expanding financial supports for low-income households are highlighted.

Enhancing skills development, R&D support and international collaboration around new clean electricity technologies like offshore wind, advanced storage solutions and Power-to-X

is advised. There are also suggestions on establishing a coordinated cross-departmental approach between government bodies to streamline policy development and project approvals. Other additional perspectives shared include concerns over impacts from rapid growth of data centres and wind farms with suggestions to limit or better manage further growth as well as urgent calls for concrete actions on eliminating energy poverty. The potential of nuclear and offshore gas reservoirs as alternatives to expand carbon-free generation is also put forward.

Alignment with Just Transition Policy Framework principles

An integrated, structured, and evidence-based approach is advocated to empower stakeholders with the right skills and ensure equitable impact. Allowing for social dialogue is also recommended. There is agreement that evidence-based policies should be developed, with a suggestion for considering nuclear power.

Ideas are put forward related to skills development for the offshore wind industry and community education around UN Sustainable Development Goals. Local and regional measures are called for to support use of renewable hydrogen in dispatchable backup generation and combined heat & power units to help build climate adaptation and community resilience.

Specific suggestions for improvement

Suggestions for improvement on the Electricity chapter were given in relation to enhancing smart meter capabilities and data access, along with streamlining the planning process for wind farms.

There is expectation that the Wind Energy Development Guidelines will be finalized, and improvement is believed to result from providing central support for power purchase agreements and completing the demand side management strategy. Concrete policy measures and timelines are requested in the National Biomethane Strategy to drive production, with biomethane seen as having the potential to provide 11% of Ireland's natural gas needs by 2030.

Overall policy support is urged to accelerate renewable energy deployment. Ideas include implementing policy to halt grid connections for intensive fossil fuel energy users without renewable supply, evaluating continued fossil fuel system incentives, and establishing an end date for new fossil fuel boiler purchases/maintenance. However, halting new large-scale onshore wind developments to protect rural communities is alternatively suggested. Facilitating matching of renewable generation to flexible demand through the TSO is encouraged. There are calls to further decarbonize electricity generation by accelerating

renewable penetration and phasing out fossil fuel plants by 2035. Strict renewable gas certification criteria are advised to avoid greenwashing.

Siting guidance for solar and wind farms is provided covering factors like grid connection, land aspects, planning policies, access roads, visual impact, conservation areas and flood risks. Prioritizing community energy funding for disadvantaged areas is also suggested to bring improvements and incentivizing reduced electricity consumption across sectors while increasing taxes on entities not decreasing usage is suggested.

The plan is expected to support local government climate action with dedicated funding streams, and ensuring that priority projects continue receiving accelerated approvals is advised in order to drive infrastructure development. Solar energy is seen as key towards meeting Ireland's EU targets and expanding small-scale solar and assessing high-impact proposals via cost-benefit analysis is suggested.

Views on prioritization of measures and actions

Views differ on what measures and actions should be prioritized. Recommendations are made to holistically evaluate waste-to-energy facilities based on their contributions to circular economy, waste management and energy security. Prioritizing policies to enable demand response of renewable electricity as well as market reforms to empower flexible consumers is urged. Linked to this, enabling flexible demand and electrification capabilities also features in the priority action suggestions.

Addressing hybrid connection barriers, progressing grid development projects and establishing a storage policy framework are seen as important near-term priorities. Accelerating smart meter rollout and data accessibility to consumers and system operators is seen as a priority for improving grid management.

Accelerating offshore wind and growing domestic biomethane to reduce imported fossil fuel dependence also rank highly in terms of priority suggestions received. Offshore wind especially should be urgently prioritized as a large-scale source of renewable hydrogen production through Power-to-X according to recommendations received. Reducing electricity demand through efficiency and conservation is advised to prioritize as well. However, some conversely emphasize priority protection for rural communities from further renewable energy development.

There are calls for renewable electricity targets to be the top focus, with resolving any barriers or delays to be treated as an emergency. Incorporating a cross-sectoral systems view and longer-term roadmaps from strategies like the National Hydrogen Strategy into the

Climate Action Plan is recommended to guide acceleration of key decarbonization infrastructure.

Ongoing prioritization of EU-designated priority energy projects is also urged. Investment priorities highlighted in the area of sustainable transport like light rail and electric vehicles emphasize meeting the needs of current and future populations. The need to perform detailed cost-benefit analyses to inform selection of measures with maximum consumer benefit and emissions impact is suggested.

3.13 Industry

Key challenges and risks identified

Key themes that emerged regarding challenges and risks in relation to the Industry chapter on the 2024 Climate Action Plan highlight concerns around rising emissions, lack of expert guidance on low carbon solutions, the impact of construction materials and embodied carbon, the role of incentives and standards in driving change, and the pace of progress needed to meet stated goals and targets.

Multiple responses noted that accelerated implementation of actions outlined in the plan will be required in order to meet stated 2030 biomethane production targets and broader emissions reductions goals for the industry sector. There appears to be common agreement that progress to date has been too slow and more urgent steps are needed going forward.

Another common theme was the lack of practical, expert guidance provided to industrial enterprises looking to transition to low carbon alternatives and processes. Respondents highlighted the need for greater specifics on viable technologies, materials, incentives, and standards that could drive faster decarbonization, rather than relying solely on carbon pricing mechanisms.

Feedback also pointed out that assumptions around high emissions from steel production do not account for even higher embodied carbon levels from concrete, which is more ubiquitous in construction. There were calls for stronger action around embodied carbon measurement, reporting requirements, incentives and public sector leadership on specifying low carbon materials.

Proposed supporting actions for 2024

Feedback on supporting actions emphasized the need to accelerate feasibility studies, policy frameworks, and working group recommendations around deployment of carbon capture utilization and storage (CCUS) technologies to reduce process emissions from cement, lime, power generation and other hard to abate industries.

There were also calls for stringent enforcement of existing energy efficiency directives aimed at the largest industrial energy users to drive continued gains in this area.

The introduction of national standards and methodologies for calculating whole lifecycle and embodied carbon of construction materials was put forward to help better understand emissions beyond just operational energy. Fiscal incentives were also suggested to further encourage supply and adoption of low carbon alternatives to incumbent materials.

In summary, proposed actions in relation to the Industry chapter focused on deep decarbonization of carbon intensive industries through CCUS, ensuring the full potential for efficiency gains is being tapped, and taking a lifecycle approach to emissions from construction materials as key issues requiring additional emphasis and tangible action in 2024.

Alignment with Just Transition Policy Framework principles

No feedback was provided in relation to this topic.

Specific suggestions for improvement

Responses with suggestions for improvement focused on the need for regulatory certainty, targeted incentives and investment, lifecycle emissions measurement, and transportation related efforts.

Multiple submissions emphasized the urgency of establishing a clear regulatory framework and strategy to enable widescale deployment of carbon capture and storage technologies across carbon intensive industries. Eligibility criteria for government supports and funding were also highlighted.

Recommendations addressed the need for better assessments of embodied and lifecycle carbon emissions from construction materials, rather than simply substituting between materials. There were also calls for reviews of building standards, targeted infrastructure investments, and fiscal incentives to grow domestic production of low carbon materials and reduce reliance on imports.

Other suggestions highlighted transport related emissions from the clustering of industrial sites along motorways as an area needing additional focus and mitigation efforts.

Responses included facilitating more dispersed development close to populations, as well as staggering work hours to ease congestion.

Views on prioritization of measures and actions

Regarding the prioritization and sequencing of climate actions targeting emissions reductions from industrial sectors, respondents focused on technology neutrality in policy

frameworks, developing coherent carbon capture utilization and storage strategies, flexibility mechanisms for hard-to-abate sectors, and suggestions on communicating priorities clearly.

One submission emphasized taking a technology neutral approach in policy and regulatory developments that allows various decarbonization solutions to compete based on effectiveness and market viability. There was call to support preparations of frameworks for longer term options like hydrogen and carbon capture so implementation can accelerate in future budget periods.

The essential role of carbon capture utilization and storage technologies for deep decarbonization was another theme, with recommendations to develop a clear national level CCUS strategy and roadmap to deployment at scale across carbon intensive industries.

Feedback suggested the use of visual aids and rating systems to better distinguish climate action priorities based on abatement potential, costs, and feasibility. This could enhance clarity on how certain measures with implementation barriers might still play an important long-term role.

3.14 Built Environment

Key challenges and risks identified

The responses identified for the Built Environment chapter highlight several key challenges and concerns regarding the government's climate action plans for decarbonizing the built environment. The most prominently cited issues are high costs, feasibility constraints, policy gaps, and implementation risks that threaten the achievement of targets.

There is concern about the high costs faced by homeowners, businesses, and the government in transitioning to low-carbon building solutions like heat pumps, district heating, and energy efficiency upgrades. With Ireland already facing economic headwinds and construction sector capacity issues, substantially increasing investments in green buildings appears difficult and burdensome currently.

Respondents question the feasibility of delivering on the proposed biomass, renewable gas, and energy efficiency targets put forth in the plan given Ireland's skill shortages, supply chain disruptions, lack of specialized labour, and materials and resource constraints. The scale of housing required also risks increasing emissions substantially through embodied carbon.

Feedback also cites a lack of concrete policy details, obligations, incentives and funding clarity across areas like embodied carbon, commercial buildings, public sector leadership,

and rental properties. Respondents emphasize the need for clearer phase-out dates of fossil fuel boilers and stronger measures to address split incentives.

Finally, multiple submissions point out that existing policies and targets for efficiency, renewables and retrofits continue to fall behind schedule, raising concerns around timely and effective implementation.

Proposed supporting actions for 2024

A key focus is on accelerating and expanding national retrofitting efforts to improve energy efficiency in line with Ireland's climate goals. Multiple stakeholders emphasize streamlining and boosting funding, removing barriers, enhancing skills training, and better integrating retrofits with renewable energy sources. Wider deployment of district heating networks, waste heat utilization, green public procurement, alternative construction materials, and building standards are also proposed to curb emissions.

The stakeholders reference Ireland's National Retrofit Programme and stress the urgent need to accelerate its implementation. Suggestions include relaxing qualifying criteria for energy efficiency funds to widen access and better support those in energy poverty. Coordinated action between local and national governing bodies is advised to execute policies smoothly. Overall, Ireland's current retrofit goals and timelines are viewed as insufficiently ambitious; more investment paired with legal and regulatory changes could rapidly scale up retrofits across the building stock to curb emissions.

Responses also push for expedited development of enhanced building standards and carbon limits for construction materials and projects. This includes proposals for earlier phase-out dates of fossil fuel heating systems in favour of renewable alternatives.

Leveraging district heating networks and waste heat, such as through requirements in new developments, garners notable support. The integration of district heating and thermal storage into Ireland's energy system flexibility plans is specifically advised. Incentives and removal of regulatory barriers for technologies like renewable-ready gas boilers, bioLPG production, and boilers running on LPG/bioLPG blends are recommended as well as Solar PV.

Another proposed action is that Ireland should introduce GHG measurement, reporting and verification for larger companies not part of the EU ETS. This could help meet national emissions reductions goals. Additionally, establishing public information resources to track progress on built environment initiatives is proposed.

Alignment with Just Transition Policy Framework principles

Comments regarding the Built Environment chapter and the Just Transition Policy Framework cover the following:

- Provide subsidies for renewable heat transition costs, since electricity is much more expensive than gas currently. Conduct more research on real-world impact of low-income home retrofits and address any issues identified. Implement data access policies to allow tailored EE advice based on consumption patterns. Supplement existing ESRI research on energy poverty with additional studies.
- Proposed acceleration of skills and capacity building aligns with principle of ensuring people have right skills for net zero economy. Reviewing renovation funding eligibility could contribute to equitable impacts.

Specific suggestions for improvement

The responses reveal a strong focus on accelerating decarbonization of building heating systems through an array of policy measures and technical solutions. Transitioning from fossil fuel boilers to low-carbon alternatives like heat pumps and district heating networks emerges as a priority area for improvement. Feedback also emphasizes the urgency of retrofitting existing buildings to improve energy efficiency in line with climate goals.

A common theme is the need to phase out fossil fuel heating faster; expanding financial incentives, information campaigns, skills training and other supports for those transitioning systems is advised. Stakeholders caution against a narrow focus on only heat pumps, recommending Ireland take a technology neutral approach that also leverages district heating, renewable gases, waste heat sources and other options.

Commenters outline the importance of increased retrofitting across Ireland's building stock to curb emissions. Suggestions focus on growing public engagement and participation through simplified, expanded funding mechanisms and supports. Reviewing real world heat pump performance data could strengthen evidence-based policies and standards. Integrating natural, sustainable materials into retrofits also garners backing.

Enhanced sustainability skills would drive adoption of innovative materials and methods going forward. Review of building regulations is also encouraged.

Views on prioritization of measures and actions

Responses reveal agreement on the urgent need to accelerate decarbonization policies, infrastructure, and funding mechanisms for Ireland's building sector. Multiple stakeholders call for expedited timelines and streamlined processes to drive faster adoption of low-carbon

heating systems, energy efficiency retrofits, district energy networks and other key measures.

Enacting Ireland's 2024 Heat Bill as soon as possible is advised to provide clear decarbonization requirements, targets and supports for phasing out fossil fuel heating. Developing complementary district heating strategies and legal frameworks is also viewed as a priority. Overall, stakeholders urge prioritizing policy development and incentives to transition building heat loads to renewable alternatives. Streamlining planning and access processes for district heating projects is recommended to accelerate network rollouts.

Upgrading building codes, inspection regimes, installer training programs and oversight processes aims to ensure energy savings from retrofits and new builds are actually achieved in practice. Making real-world building performance data publicly available can support evidence-based standards and close efficiency gaps. Finally, implementing tax incentives for retrofits is viewed as a priority in order to address split incentive barriers for landlords and tenants.

3.15 Transport

Key challenges and risks identified

The most prevalent challenges and risks highlighted in the feedback on the Transport chapter relate to the ambitious emissions reduction goal for the sector, lack of infrastructure to enable low carbon transport modes, contradictory policies enabling high-emissions growth in some areas, and delays in delivering sustainable transport projects.

Responses state that the emissions reduction target for transport by 2030 will be very difficult to achieve given high reliance currently on fossil fuels.

A common theme across responses is the need for massive expansion of public transport networks, walking and cycling infrastructure to facilitate modal shift. However, progress has been slow. Insufficient electric vehicle charging networks are seen as a risk stalling adoption.

There is the opinion that some planning policies still enable car-dependent urban sprawl and that the plan to expand aviation infrastructure contradicts climate goals.

Proposed supporting actions for 2024

The proposed actions for the Transport chapter focuses heavily on accelerating the rollout of alternative fuel infrastructure, particularly for electric vehicles, biomethane, and hydrogen. There are also calls to rapidly phase out fossil fuels, invest in public and active transport, and ensure planning policies enable sustainable development.

Numerous stakeholders emphasize the urgent need to expand EV charging networks, CNG/bioCNG stations, electrolyzer projects, and hydrogen refuelling infrastructure. Recommendations include financial incentives, removal of planning barriers, grid reinforcements to support EVs, and learning from effective approaches abroad.

Some responses urge fossil fuel phase-outs by 2035 at the latest. To enable this, requests call for upscaling Local Link bus services and ensuring disability access.

Feedback stresses that new housing must enable low-carbon lifestyles through public transport access and walkability. Suggestions include revising planning policies allowing sprawl, applying parking limits in developments, and fast-tracking sustainable transport projects like MetroLink and DART+.

Unique ideas put forward include free public transport days, rain shelters at stops, real-time arrival data, increased car sharing, deterring SUV purchases through taxes, and incorporating expert narratives on reframing cycling as "traffic" rather than transport.

Alignment with Just Transition Policy Framework principles

A few themes emerge regarding the Transport chapter and its alignment with the Just Transition Policy Framework principles.

There's a call to implement best practices in carbon management, electric vehicle (EV) charging infrastructure, active travel facilities, transport hubs, and freight hubs. Suggestions include utilizing time-of-use tariffs and smart charging to balance grid demand during peak hours. Furthermore, concerns regarding job displacement in the auto industry due to the transition towards EVs highlight the need for adequate retraining and skills development programs. Addressing disparities in charging infrastructure access, particularly in disadvantaged areas, is also emphasized. The importance of ongoing multi-stakeholder dialogues to ensure a smooth and inclusive transition is also highlighted.

One response strongly emphasizes the role of Green Public Procurement (GPP) in achieving transport emission reduction goals. Specific recommendations include focus on Vehicle Rental, going beyond the EU Clean Vehicles Directive by including rental vehicles in low/zero-emission procurement targets; utilizing consistent frameworks across sectors to streamline GPP implementation; incorporating environmental and social criteria into procurement decisions, moving away from solely price-based considerations.

The feedback received also highlights the potential of revitalizing areas at risk of decline through improved public transport connectivity. The example of opening the Youghal train line is provided, suggesting it could support the development of a "15-minute town" pilot program.

Specific suggestions for improvement

The suggestions for improvement given encompass diverse aspects of sustainable transport, reflecting a strong desire for ambitious action and innovative solutions.

A recurring theme is the need to prioritize public transport, active travel (walking and cycling), and shared mobility options. Suggestions include improving public transport infrastructure and integration, enhancing pedestrian and cyclist safety, promoting car-sharing schemes, and discouraging private car use through measures like congestion charges and parking policy reforms. There are also calls to incentivize sustainable transport choices, such as providing free public transport for school children and reversing recent cuts to EV grants.

Feedback emphasizes the importance of streamlined planning processes to accelerate the delivery of sustainable transport infrastructure. This includes calls for incorporating cycle infrastructure standards and health impact assessments into transport planning and appraisals. Additionally, suggestions highlight the need for a regional breakdown of modelling and targets in Climate Action Plan reports to facilitate effective project planning at the local level.

Several suggestions focus on managing transport demand and promoting sustainable land use planning. These include implementing taxation measures to curb private car use, utilizing the National Planning Framework revision to require access to public transport and higher densities in new developments, and exploring alternative charging solutions for apartment dwellers to encourage EV adoption.

Respondents also recognize the potential of emerging technologies and fuels in decarbonizing the transport sector. Suggestions include exploring vehicle-to-grid integration for grid stability and optimizing energy storage, signalling long-term government support for renewable fuels like BioLPG and rDME, and establishing a National Hydrogen Certification Scheme.

Finally, the feedback highlights the interconnectedness of transport with other sectors such as tourism. Suggestions include adding a section on the link between transport and tourism emissions and incorporating aviation and shipping in Sectoral Emissions Ceilings.

Views on prioritization of measures and actions

The views on prioritization reveal emphasis on specific measures and actions within the Transport chapter to effectively address greenhouse gas emissions and promote sustainable mobility.

A recurring priority is the need to invest heavily in public transport infrastructure and services, along with promoting active travel options like walking and cycling. This includes calls for prioritizing the delivery of major public transport projects, such as light rail expansions, and ensuring their inclusion in the Climate Action Plan.

Feedback also stresses the importance of enacting fiscal measures to discourage private car use and incentivize the shift towards more sustainable modes of transport.

Accelerating the transition to electric vehicles (EVs) is another key priority highlighted in the feedback. Suggestions include significantly expanding the EV charging network, particularly in public areas and tourist destinations, and providing greater incentives for EV business use. Addressing challenges related to EV adoption in the rental sector is also emphasized, with proposals for targeted policies and infrastructure support.

There are mentions in relation to tackling emissions from Dublin Airport. Feedback calls for prioritizing measures to mitigate aviation's environmental impact and incorporating non-CO2 impacts into planning considerations.

Support for exploring and implementing emerging technologies and fuels, such as hydrogen and renewable fuels like BioLPG and rDME, is evident in the feedback. This includes calls for specific measures to support the production, supply, and use of renewable hydrogen in the transport sector, particularly within the public sector and for specialized vehicle fleets.

Feedback also emphasizes the importance of data-driven decision-making and leveraging digital technologies to enhance the user experience. This includes a suggestion for enabling seamless digital experiences through data interoperability for customers and continuing advancements in EV integration with technologies like AI and vehicle-to-grid systems.

3.16 Agriculture

Key challenges and risks identified

Much of the public feedback indicates that the measures outlined in the Climate Action Plan regarding agriculture are inadequate to drive the paradigm shift needed to reach climate targets. There are concerns about an overreliance on unproven measures and technologies that have failed to reduce emissions over the past decade. There is call for specific plans to address the high emissions from meat production.

Multiple respondents state that the current policies and plans lack concrete measures and mechanisms needed to ensure participation and emissions reductions across agriculture. One of the responses note unrealistic optimism about the potential of solutions like feed

additives. Others highlight a need for regulations, incentives, and standards to drive measurement, reporting, and verification of emissions across the sector.

Feedback emphasizes that animal agriculture accounts for almost 40% of Ireland's emissions, yet there is little addressment of this issue. With Ireland's large beef and dairy industry relative to land size, reducing meat production is viewed as necessary to reach climate targets.

Respondents stress the importance of building consensus and support for farmers in the transition to sustainable agriculture. The view is that without proper backing, it will be very difficult for farmers to implement the measures outlined. Respondents call for a focus on solutions, supports, and partnerships to enable this shift.

Additional concerns include the lack of support for tillage farming, the singular focus on nitrate issues, the carbon footprint of burning wool, and the need to monitor renewable energy progress. Overall, bold steps are viewed as essential to drive the systemic transformation needed in Irish agriculture.

Proposed supporting actions for 2024

Proposed actions indicate that more transformative efforts are expected in order to drive the necessary changes in Irish agriculture beyond incremental tweaks to the current system. There are calls for policies that promote diversification towards more plant-based and regenerative agriculture.

Responses reference the potential role of bio-based inputs like plant bio stimulants to improve nutrient and water use efficiency as well as climate resilience of crops. Actions to support delivery and uptake of such inputs are proposed. There is also emphasis on developing programs and investments targeted specifically at tillage farming to halt the decline in crop production.

Multiple stakeholders highlight the need to transition diets and farming systems towards more plant-based models that grow food to feed people directly rather than funnelling crops through animals. Reducing production and consumption of meat and dairy could deliver significant climate, health and environmental benefits. Proposed actions centre on supporting this transition financially and technically.

Submissions endorse the development of supports for conversion to and expansion of organic production systems. Potential actions put forward include skills training, financial incentives, and promotion schemes.

Additional perspectives call for stronger commitments to phase out fossil fuel use in agriculture and promote alternatives like bioLPG. Others emphasize monitoring issues related to pollution from burning of animal byproducts. There are also suggestions for private sector emissions reporting schemes. Overall, systemic transformation encompassing diet, production practices, supply chains, and regulation is seen as essential.

Alignment with Just Transition Policy Framework principles

Feedback in relation to alignment with Just Transition Policy Framework principles refer to offer support to farmers through communication, education, and incentives, and the back of plant-based diet and ensure that dietary changes happen equitably.

Specific suggestions for improvement

Similarly to the proposed supporting actions given, the feedback themes suggested for improvement call for more transformative efforts beyond incremental policy changes promoting farm diversification and agroecology given the urgency of climate challenges.

With the view that livestock numbers are stabilizing but associated pollution continues rising, responses urge realism around technical solutions like feed additives that have achieved limited emissions cuts to date. One response notably advises developing a national biomethane project rollout plan. But there is the ask to look beyond biomethane alone - evaluate renewable fuels potential in Ireland, including biomethane from cattle manure and municipal waste.

Electric/hydrogen farm machinery and plant-based diets appear as common policy priorities, as well as increase support for organic farmers and expanded organic farming. Enable open dialogues between farmers, scientists/academics to shape agricultural policies.

Views on prioritization of measures and actions

The main focal areas for prioritizing agricultural climate measures relate to plant-based solutions and diversification. Responses call for prioritizing plant bio stimulants along with other bio-based agricultural inputs as climate smart alternatives, tracking and accelerating key biomethane actions per the forthcoming National Biomethane Strategy, and communicating plant-based measures as top priorities to the public also stands out as a critical recommendation.

Other feedback asks for a feasibility study on production capacity for wool to be conducted, as well as on construction materials using timber, industrial hemp, straw and other agricultural fibres/bio-based materials - exploring job creation potential in diversifying agriculture while cutting emissions; and there are suggestions to accelerate promotion and

support for tillage and significantly build out communication campaigns and public awareness-raising around high impact plant-based measures.

3.17 Land Use, Land Use Change, and Forestry

Key challenges and risks identified

The most frequently expressed challenges and risks in the feedback centre around the adequacy and efficacy of proposed emissions reduction measures, the issues impacting landowner participation and cooperation and the concerns about ongoing land use changes that harm ecosystems.

Respondents view the current measures as wholly inadequate and unlikely to counter rising livestock emissions. There is scepticism about the feasibility of relying largely on voluntary participation and efficiency gains to reduce ruminant methane output rather than take more substantive action like reducing ruminant numbers.

Submissions point to challenges securing participation and cooperation from landholders, citing issues like gender imbalance among farmers and conflict between rural values and conservation efforts. Low female land ownership levels and group identity dynamics create difficulties devising inclusive policies.

Many responses express alarm about ongoing land use changes (e.g. conversion to wind/solar farms) that damage ecosystems and ecological resources like water courses. There is frustration with prioritizing renewable energy infrastructure over biodiversity.

Proposed supporting actions for 2024

Submissions recommend establishing new governing bodies like a Land Commission to monitor land ownership patterns and concentration levels. This could help promote wider community ownership models. Some welcome ongoing efforts to develop a National Bioeconomy Action Plan.

Feedback also emphasizes the need to include local knowledge from farmers and to demonstrate appreciation for their skills, especially consideration for women farmers often overlooked. Feedback suggests factoring gender more in policy design. Other actions recommended are providing more online seminars and improved localization to boost public participation.

There is also a call to review Section 40(1)(a) of the Wildlife Act 1976 as amended by the Wildlife (Amendment) Act 2000 and the Heritage Act 2018 as at the moment it allows for clearance of vegetation in specific cases.

Alignment with Just Transition Policy Framework principles

One unique response given regarding Just Transition Policy framework highlights that disagreement between tourism promotion and private landlords/companies such as Airbnb are causing issues to rural communities.

Specific suggestions for improvement

There are multiple suggestions for improvement across different areas pertaining to Land Use, Land Use Change and Forestry.

Some views urge a shift from voluntary participation to imposing regulatory production limits and binding targets to guarantee emissions reductions. Others advocate moving toward agro-ecological practices and localized food systems aimed more at community needs rather than meat and dairy commodity exports.

Regarding policies, there are requests for more evidence and data in policy plans to assure oversight and proper allocation of resources. One example includes citing tourism industry funding amounts.

Feedback also focuses on boosting habitat protections, including calls for penalties for unauthorized hedgerow removal, and limiting developments like wind/solar farms in agricultural areas.

Views on prioritization of measures and actions

The feedback on prioritization emphasizes three primary areas: emissions reductions, sustainable forestry, and peatland restoration.

The predominant viewpoint is that binding measures and targets to control agricultural production volumes and livestock numbers should be the highest priority, as these directly impact the bulk of land use emissions.

There are calls to refocus efforts toward transitioning tree plantations to continuous cover forestry models using longer rotations to improve carbon storage. Developing Ireland's native hardwood industry is also recommended as sustainably managed native woodlands expand. Incentivizing agroforestry practices on farms is seen as supporting agriculture to play a bigger role in climate and biodiversity goals.

Prioritizing the rehabilitation of degraded Bord na Móna bogs and additional peatlands is advised to restore these important habitats for climate mitigation and biodiversity preservation.

3.18 The Marine Environment

Key challenges and risks identified

The feedback regarding the marine environment chapter of the Climate Action Plan highlight several key challenges such as delays and barriers in licensing and supply of seaweed which limit growth in the seaweed and marine biotechnology sectors. Respondents say that there are misconceptions about the role of seaweed in carbon sequestration.

Respondents also raised concerns over resource constraints for public bodies overseeing offshore wind development, which could create bottlenecks for projects. A lack of monitoring plans for the marine environment was noted.

Feedback emphasized the need for connected strategies to protect the coastal environment with respect to climate change, environmental protection, and security. Strict enforcement of Marine Protected Areas was called for, noting failures in terrestrial environments to successfully deter harmful actions despite legal protections being in place.

The need for greater resourcing, enforcement, and monitoring regimes to enable protection of the marine environment is seen as key to align with climate goals.

Proposed supporting actions for 2024

One supporting action for the marine environment chapter was to accelerate development of additional offshore wind Designated Maritime Area Plans (DMAP). This reflects strong support for expanding offshore wind capacity. Establishing a joint government-industry forum to coordinate offshore wind policy development is advised.

Prioritizing licensing of wild seaweed harvesting and developing supportive policies for future licensing was also raised. However, feedback indicated that clarification around the limited role of seaweed in carbon sequestration will need to be addressed.

Another response took a more critical stance - arguing that transitions within the seafood system are inadequate and that marine environments require complete protection from exploitation. This perspective clashes with the other proposed actions.

Alignment with Just Transition Policy Framework principles

Below are direct mentions or a summary of the feedback received.

- Endorses integrating just transition into climate policy, maximizing employment opportunities. Their NISA project incorporates community benefit initiatives.
- Only small trawlers should be allowed for fishing - no supertrawlers in any of Irish marine environment.

Specific suggestions for improvement

Suggestions for improvement are related to licensing of wild seaweed harvesting, increased resourcing for public bodies to interact with offshore wind sector, invest in creating multiple DMAPs for rapid capacity growth and consider transitioning to a plant-based food system as the primary solution to addressing marine habitat destruction and biodiversity loss.

Views on prioritization of measures and actions

Below are direct mentions or a summary of the feedback received.

- Calls for licensing of seaweed harvesting to be prioritized on par with offshore renewable energy projects in terms of prioritization of measures and actions.
- Prioritize timely progress of ORESS projects through planning.
- Number 1 priority should be "achieving 30% MPA coverage by 2030".

3.19 Local Government

Key challenges and risks identified

The responses highlighted barriers inhibiting local governments from driving climate action. It is said that local authorities still view their primary role as a facilitator rather than providing active leadership and resources. Enacted policies are seen as frequently failing to address emissions reductions holistically across areas like buildings, transportation, and embodied carbon.

Calls were put forth for local governments to enable public access to land assets, foster grassroots innovation, bolster transparency, further develop internal climate expertise, and pursue cross-jurisdictional collaboration. Commentary also indicates local bodies have thus far insufficiently catalysed or supported climate solutions at the community level. Bridging these leadership, policy, capacity, and public engagement gaps is presented as imperative for both community and national-level climate progress.

Proposed supporting actions for 2024

Below are direct mentions or a summary of the feedback received.

- More Investment in Rivers; Create Public Water Refill Stations; Establish Nature Bus Network; Expand Native Woodland Conservation Scheme; Establishment of Sea Grass Nurseries
- Climate Action Plan 2024 calls for a DZ action group to explore the “strategic challenges and opportunities” of DZ implementation. For DZ implementation by 2030 it is critical that this action group is convened as soon as possible.

- Recognize key role of local authorities, provide training and capacity building for local authority staff and elected members.
- Support of interdepartmental exchange of climate change actions.
- Currently Ireland has one of the lowest number of allotments and community gardens in Europe. Access to land is difficult for community groups. The Climate Action Plan should recognise the role of community supported agriculture, urban agriculture, and farmer's markets in helping provide methods for locally produced food.

Alignment with Just Transition Policy Framework principles

Below are direct mentions or a summary of the feedback received.

- More focus needs to be placed on community-led initiatives, including community gardens, allotments, community supported agriculture, food hubs etc.

Specific suggestions for improvement

Specific suggestions for improvement related to the Local Government chapter cover some isolated suggestions around forestry regulation, staff training, planning oversight, allotments/gardens. To summarize these specific responses:

- Transferring forestry regulation from the agriculture department to the environment department is recommended to better manage forests as a climate resource.
- Targeted training is proposed to build local authority staff capacity on emissions measurement, low carbon construction, and whole lifecycle impacts.
- Requiring climate action office approval on all development applications is suggested to ensure alignment.
- Increasing allotments, gardens, and local agriculture is encouraged to enable more distributed food production.
- Developing a wool production pipeline beyond crafts/retrofits is mentioned.

Views on prioritization of measures and actions

Below are direct mentions or a summary of the feedback received.

- Emphasizes support for farmers to transition grassland management practices on cutaway peatlands to enhance climate benefits. Prioritization of funding opportunities for peatland rehabilitation and restoration is also referenced.
- Local authority plans should prioritize actions based on emissions reduction potential.

3.20 The Circular Economy and Other Emissions

Key challenges and risks identified

The responses on the Circular Economy chapter of the 2024 Climate Action Plan highlighted several key challenges and risks facing Ireland. Submissions pointed to the need for investment in improved recycling and waste management facilities to reduce reliance on export. Lack of consumer awareness and public engagement around recycling and the circular economy was another issue raised. Respondents emphasized the importance of communication campaigns and coordinated efforts to educate the public on proper recycling practices to meet ambitious national targets. Similarly, delays in establishing clear circular economy targets across industrial sectors was cited as an obstacle.

Beyond infrastructure and policy gaps, reducing economy-wide waste, changing consumer behaviours, and enabling circular business models were noted as critical to advancing Ireland's circular economy. Specific challenges called out included procuring space for community-based upcycling initiatives, lack of insurance products for green enterprises, and the proliferation of difficult-to-recycle e-waste from digital devices. While responsive policies and programs will be essential going forward, submissions concurrently cited lagging public interest and engagement as a risk factor that must be mitigated.

Proposed supporting actions for 2024

The feedback stressed that realizing Ireland's circular economy ambitions will require reinforcing actions spanning infrastructure development, policy signals, business model innovation, skills training, public awareness, and financial support.

Respondents see the need to align circular economy efforts under the Climate Action Plan with targets and actions laid out in the National Waste Management Plan. Leveraging waste-to-energy infrastructure and increasing landfill fees were specifically cited as impactful measures. Calls for establishing a biomethane strategy and support scheme also emerged as a theme.

Investing in improved domestic recycling and materials recovery capabilities featured in the feedback as well as proposals centred on strategic investments in sorting technologies, near-shoring of waste management infrastructure, and fostering innovation hubs to enable circular business models.

Looking beyond infrastructure and policy mechanisms, responses consistently highlighted the foundational importance of data transparency, education, skills development, and financial incentives to drive mass adoption of circular practices.

Alignment with Just Transition Policy Framework principles

Below are summaries of the two responses received.

- Provide support to impacted industries and workers during transition and enable workforce upskilling and social dialogue.
- Acknowledges waste sector role, need for skills training, data to understand impacts.

Specific suggestions for improvement

Submissions on circular economy policies emphasized taking a more granular, product-level approach to enable better recycling data and material traceability. Installing sorting capabilities at waste-to-energy plants and improving sorting processes at materials recovery facilities for items like beverage cartons were specifically highlighted. Measures to incentivize public behaviour change around separation and recycling were also proposed, including optimization of deposit return schemes across jurisdictions.

Removing barriers to industrial symbiosis through by-product reuse was another theme, as well as proposals to review product classifications and include biodiversity impact assessments.

Suggestions also focused on installing self-service dispensers and reusable container systems in retail outlets to reduce packaging waste and reuse of construction waste for use as fill material for buildings and roads.

Overall, while submissions acknowledged progress in Ireland's circular economy policies, they emphasized significant room for improvement around data transparency, traceability mechanisms, consumer engagement incentives, regulatory barriers, systems-level design, alternative business models, and communicating cross-cutting sustainability benefits. A more holistic, product-focused approach was widely endorsed to drive step-change improvements.

Views on prioritization of measures and actions

Feedback emphasized the importance of prioritizing public awareness and education campaigns focused on increasing recycling rates across all material streams. Messaging highlighting recyclability of items like beverage cartons was encouraged. In tandem with communication efforts, recommendations prioritized accelerating and optimizing the national deposit return scheme while strategically investing in domestic recycling infrastructure.

Responses also elevated the urgency of establishing a national excellence centre to foster innovation and circular business models. Publishing an updated circular economy strategy

with emphasis on reuse and repair over straight recycling also emerged as an area for near-term prioritization.

3.21 International Climate Action

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- Measures do not take into account the vast amount mineral extraction and the associated pollutions and biodiversity losses, as well as the climate change impact by opening up enormous amounts of ground that releases CO₂.
- Too much emphasis on technology to solve climate change problems which is caused by technology in the first place.

Proposed supporting actions for 2024

- Change of living styles and values.

Alignment with Just Transition Policy Framework principles

- Reduce industries, invest in alternative, sustainable living.

Specific suggestions for improvement

- Push for a date for the ending of fossil fuel usage. Push against the use of biofuels and e-fuels in easy to electrify solutions/sectors. Push for climate finance for the Global South to increase by a factor of at least 10 with the most polluting nations increasing their contributions by a factor of 100.
- Stop ravishing poor countries that have little or no environmental and human laws for their minerals and resources for our industries.

Views on prioritization of measures and actions

- No feedback was provided in relation to this topic.

3.22 Sustainable Development Goals

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- Poverty, hunger, clean affordable energy for all.

- The challenges identified include the vilification of the freight distribution and logistics sector for its use of fossil fuel, spiralling fuel prices as demand diminishes, delay in projects such as the ECO driver training programmes, and validation of HVO as a valid and effective fuel.
- I'd like to see long-term planning for a stable global economy in the developed world, moving away from the current growth driven model. Also, moving away from speculative financial instruments. For example, adopting some proposals set out by the economists and scientists from Earth4All, and The Club of Rome. Surely, there must be some sensible proposals we can implement in Europe to align with this philosophy.
- I'd also like to see much more in our Strategy about local food production systems, such as permaculture and regenerative agriculture, alongside State guaranteed price controls (for consumer affordability and support of farmer income), with usual safeguards.
- Also, what are we doing to prevent famine and drought in East Africa - incl. Sudan, Ethiopia, and other famine prone regions? Can we, through our good offices, do much more here to build food, water, and agricultural resilience in these communities - for example, through locally support infrastructural projects? Enlist support of Irish Aid and the World Food Programme.
- Climate and justice issues are interlinked.
- Remove No 8 of the Sustainable Goals - Economic Growth is NOT sustainable is NOT a sustainable goal; it uses natural resources, increases waste exponentially and impoverishes nature.
- As long as Economic Growth is in this list, the other Sustainable Goals can never be achieved.
- The work of EnergyCloud supports the United Nations Sustainable Development Goals (SDGs), specifically SDG 1 (No Poverty), SDG 7 (Affordable and Clean Energy), SDG 11 (Sustainable Cities and Communities) and SDG 13 (Climate Action).
- Awareness of benefit and promote use as a framework in planning and to develop communities.

Proposed supporting actions for 2024

- No feedback was provided in relation to this topic.

Alignment with Just Transition Policy Framework principles

- No feedback was provided in relation to this topic.

Specific suggestions for improvement

- Calls for tax supports to encourage commercial fleet operators to purchase alternatively fuelled vehicles, representation of industry at all decarbonising transport stakeholder groups, and pragmatic approach towards EU directives and requirements.

Views on prioritization of measures and actions

- Prioritize provision of data and evidence to track progress. Questions recent data showing Ireland's linear economy and waste generation rates.
- FTA Ireland believes in prioritizing projects that switch away from diesel and reduce CO2. They also suggest prioritizing the review of bio-fuel obligation scheme under the Road Haulage Strategy.

3.23 Adaption

This chapter has a limited number of responses. Below are direct mentions or summaries of the feedback received.

Key challenges and risks identified

- Lack of integration between adaptation and mitigation responses leading to unintended consequences. Definitions of resilience focus on assets rather than communities/people.

Proposed supporting actions for 2024

- Align resilience frameworks with global frameworks that focus on wellbeing of people and communities. Conduct health impact assessment for CAP25.
- A major funding investment.

Alignment with Just Transition Policy Framework principles

- Act to overcome clientelism, lobbying and cronyism.

Specific suggestions for improvement

- Define what resilience means for Irish communities. Include summary tables linking environmental/health impacts to proposed CAP actions/measures.

Views on prioritization of measures and actions

- Prioritize funding for cross-sectoral collaboration to address health impacts.
- Direct funding to less well off.

4 Feedback on SEA

Broadly, the feedback received on Climate Action Plan 2024 was positive. The proposed community-focused strategies and emphasis on transparency and data-driven decisions were widely praised. However, many responses stressed the need for prompt and effective implementation of the plan, as well as meaningful public engagement going forward.

Key Issues

Use of Circular Material Use Rate

Some concerns were raised about limitations of the Circular Material Use Rate metric used to measure circular economy progress. Specifically, it rewards recycling more than repair and reuse activities higher up the waste hierarchy, which could have a bigger impact on reducing overall consumption.

Health Impact Assessment

Multiple responses called for a more comprehensive and specific assessment of the health impacts of the plan, with recommendations to conduct a dedicated health impact assessment for the 2025 plan. Reporting of health effects and mitigation measures was requested in a standardized format similar to that used for environmental effects.

Engagement of Impacted Communities

Many emphasized the critical importance of community engagement, particularly those most vulnerable to climate impacts and transition risks, in order to build support and ensure a just transition. Specific groups noted as needing prioritized outreach included fisheries, agriculture, and the Western region.

Interagency Coordination

Some pointed to a lack of alignment and coordination between local and national climate action plans. Ensuring consistency across government plans through established review procedures was advised.

Recommendations

Key recommendations for improvement included:

- Reconsidering proposals for large-scale seaweed cultivation carbon sequestration due to feasibility uncertainties.
- Enhancing health impact assessment and centered vulnerable community engagement.
- Aligning climate plans across government agencies and jurisdictions.
- Incentivizing sustainability measures higher on waste hierarchy, e.g. repair and reuse.

Overall the feedback indicates broad support for ambition of the plan paired with calls for urgent, inclusive, and concrete actions towards stated climate goals. Effective follow-through measures on stakeholder input could go a long way to further build societal climate action momentum.

5 Overview of DECC Responses to CAP24 Public Consultation

The Department of the Environment, Climate and Communications (DECC) has carefully considered the wide-ranging feedback received through the public consultation process on Climate Action Plan 2024 (CAP24). The responses, submitted by individuals, organisations, and experts across various sectors, have been examined by the relevant climate policy teams within DECC and provided valuable insights that will inform the ongoing development of Ireland's climate action policy.

One of the overarching messages that emerged from the consultation was the urgent need for accelerated action to address the climate crisis. Many respondents emphasised that Ireland is not acting fast enough to meet its climate targets and called for more ambitious and rapid implementation of measures across all sectors. This feedback is particularly encouraging, as it demonstrates a growing public awareness and desire for decisive climate action, which aligns with the government's commitment to achieving a climate-neutral economy by 2050.

DECC recognises the importance of clear communication and public engagement in building support for climate action. The consultation highlighted the need for accessible information, transparent decision-making, and meaningful opportunities for stakeholder participation. In response, DECC will continue to prioritise open and inclusive dialogue as it develops and implements climate policies, working to ensure that all voices are heard and that the benefits and challenges of the transition are widely understood.

The consultation underscored the importance of a Just Transition that leaves no one behind. Respondents emphasised the need to support vulnerable communities, protect workers in affected industries, and ensure that the costs and benefits of climate action are fairly distributed. DECC is committed to integrating Just Transition principles into all aspects of its climate policy, and will work closely with stakeholders to develop and deliver measures that align with Just Transition principles. Ireland's Just Transition Commission, which will be established later this year, will help ensure that Ireland achieves its climate objectives in a way that is fair and equitable and protects vulnerable people and communities.

While the public consultation yielded a wealth of valuable insights and suggestions, it was not possible to incorporate all the feedback into this particular iteration of the Plan. This was due to several factors, including the need to maintain the overall coherence and strategic direction of the Plan and the constraints imposed by existing policy frameworks and legislative requirements.

Having reviewed all submissions in detail, DECC policy leads noted in many cases that the issues raised by stakeholders were already being addressed, at least to some extent, by existing actions, targets, or strategies, whether within CAP24 or other related policies. Where this was the case, the leads emphasised that the matters of concern were being given due attention, even if the specific language or framing suggested by the respondents could not be directly incorporated into the Plan.

For novel proposals or areas identified as requiring further development, the policy leads recommended that these items be considered for inclusion in future iterations of the Climate Action Plan, particularly CAP25 and beyond. This approach allows for more time to assess the feasibility and potential impact of these suggestions, as well as to align them with the evolving policy landscape and the latest scientific evidence.

In some instances, the policy leads determined that the feedback received was more directly relevant to the work of other government departments, agencies, or expert groups. In these cases, the input will be shared with the appropriate entities to inform their ongoing work and ensure that the insights gathered through the consultation process are not lost.

Many of the suggestions and insights received through the consultation are within the scope of the Climate Action Plan, and these will inform the discussions and development process of the working groups tasked with developing future iterations of CAP, ensuring that stakeholder input is given due consideration at all levels of the policymaking process.