Chambers Ireland

100 YEARS OF ADVANCING BUSINESS TOGETHER

Chambers Ireland's Submission to the Department of the Environment, Climate and Communications' Call for Expert Evidence - Climate Action Plan 2024

July 2023

Call for Expert Evidence - Climate Action Plan 2024

Contents

About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Our Network has pledged to advocate for and support the advancement of the United Nations Sustainable Development Goals (SDGs) and, in 2023, we were appointed to be an SDG Champion as part of the 2023-2024 SDG Champions Programme. Accordingly, we use the Goals as a framework to identify policy priorities and communicate our recommendations. We have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), gender equality (SDG 5), industry, innovation and infrastructure (SDG 9) and climate action (SDG 13).[1]

In the context of the current consultation, climate action is the most relevant sustainable development goal. However, the Climate Action Plan also impacts across all of our economy, as being a clean energy economy will have an enormous effect on our capacity to support decent work and economic growth (SDG 8), affordable and clean energy (SDG 7), and the effective delivery of a suite of policies that are of vital interest to our industry, innovation, and infrastructure (SDG 9) opportunities. It is for these reasons that we are submitting a response to this consultation.

Chambers Ireland's Perspective

Chambers Ireland welcomes the open consultative process and the broad engagement with stakeholders on the National Climate Action Plan 2024.

A long-term focus on reaching our climate targets requires coordinated action and a clear roadmap for all stakeholders across both the public and private sectors. The Climate Action Plan has been instrumental in defining that roadmap and plotting our course to climate neutrality. However, the previous iterations of the Plan have failed to result in adequate levels of progress. We have been set the goal to reduce the

[1] The Chambers Ireland SDGs. Available at: https://chambers.ie/sustainable-development-goals/

extent of further global warming, by pursuing and achieving, "by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy". The interim goal of achieving a 51% reduction in greenhouse gas emissions by 2030 compared to 2018 levels also sets a clear parameter for the actions we need to take and the level of activity that needs to be implemented if we are to meet these targets and achieve meaningful results. In 2021, Ireland had one of the highest rates in the EU of greenhouse gas emissions per capita, with agriculture making up the largest share per sector and representing 37.5% of total emissions. Our transport and energy industries are the second and third largest contributors respectively.

The Environmental Protection Agency recently projected that Ireland will achieve a reduction of 29% in greenhouse gas emissions by 2030, compared with the target of 51%. This is not good enough and highlights a need to rapidly accelerate our climate action ambitions.

Sectoral Emission Ceilings

1.What do you view as the key actions required to ensure the emission reduction targets set out in the Sectoral Emission Ceilings are met?

A clear action plan, robust monitoring and clear enforcement mechanisms are required to ensure we meet the emission reduction targets set out in the Sectoral Emission Ceilings.
The sectors need to be clear on the parameters, understand their obligations, be supported fully with advice and financial supports, and be aware of the penalties in place.
Advice will need to be continuous and based on accurate and up-to-date reporting.

2.What do you view as the main challenges/obstacles to the Sectoral Emission Ceilings being met?

The main challenge is the lack of a detailed action plan. Stakeholders in the relevant sectors need more information on what their obligations are and how they will meet their reduction targets between now and 2030.

If they fall behind on their targets now because of a lack of understanding on how to progress, then it will be very difficult to catch up and meet the 2030 goal, which will result in sectoral emission ceilings being missed. We cannot afford any more delays or missed deadlines.

There is also an enormous weight being placed on the electricity sector in the lead up to 2030. If we reach our targets in this sector, this will place the post-2030 focus squarely on the agriculture sector, which will then be the source of a huge disproportion of our carbon emissions and will need a radical action plan to address these emissions if we are to ultimately reach our 2050 climate neutral target.

Carbon Pricing and Cross-Cutting Issues

1.Are there any unintended barriers within the planning system that should be addressed at national policy level in order to deliver our climate ambitions?

The biggest issue with the planning system is the lack of organisational capacity. Decisions on licencing, gird access and planning permission take too long to be made and, without an effective, efficient and timely decision-making capacity in place, this has resulted in huge backlogs and delays. Waiting times are untenable and are having a detrimental impact on a number of crucial infrastructure projects, including housing, transport, and our energy system. All of which are essential elements in our national competitiveness and central to our climate goals.

We need a planning system that is effectively resourced and empowered to deliver on these essential projects as efficiently as possible. We need to strengthen and resource the planning professionals in the Local Authorities and other relevant agencies. This includes planning departments in Local Authorities, An Bord Pleanála and the Office of the Planning Regulator. Resources need to be directed not only at improving efficiencies in dealing with planning applications, but also ensuring that effective, engaged public consultation is being supported at the earliest stage in the process. Should objections and disputes regarding infrastructure developments arise, we need the urgent establishment and resourcing of the Planning and Environment Court.

4.What additional opportunities exist to further promote the digital transformation of our economy and society to support Ireland in its transition to a carbon neutral society?

Decarbonisation must go hand in hand with digitalisation, as new and emerging digital technologies can improve monitoring, reduce waste, and increase operational efficiencies. In order to promote the digital transformation, it would be useful to keep messaging focused on the twin transition and the hand-in-hand benefits that can be derived from focusing on digital and green investment. Simplifying advice and resources in this space would encourage more businesses to update their business models and prioritise green and digital infrastructure simultaneously.

5.What regulatory and administrative supports can be provided to organisations to help them carry out their business in a manner that aligns with the National Climate Objective?

Support is needed for SMEs in this space as they often do not have the resources or capacity to understand the scope of national climate ambitions and how they can play a part in meeting climate targets. Chambers Ireland is an SDG Champion for 2023-2024 and the sustainability agenda is promoted widely throughout the network. As a result, many SMEs within our network are aware of how making small changes to their operations and becoming more sustainable can benefit their business, local communities, and the environment. However, they need support to understand where they can make these changes and how their actions can feed into National Climate Objectives.

Electricity

1.What options are available to increase the penetration of renewable electricity beyond the 80% committed to in Climate Action Plan 2023?

If we are to meet our revised 2030 emission targets, we will have to reduce our total emissions by more than 20 million tons of CO_2. The Climate Action Plan aims to see half of that reduction arise through the migration of our electricity supply generation system to renewables. Half of that decrease is to come from the increase in electricity generation using onshore wind. To increase the generation capacity of this sector we will need to double the scale of our onshore wind turbine fleet. Simultaneously we will need to

create an offshore fleet which has a greater capacity than the entirety of our current onshore wind generated electricity supply.

The Irish fleet of onshore wind turbines would have had to more than double in capacity from 4GW up to 8GW in the coming years. However, many of the projects which are in development may be unable to progress due to regulatory impediments in the planning process. Particularly concerning is the lapsing of planning permissions in the case of existing windfarms, so to is the resistance in certain local authorities to the repowering of existing windfarms.

The ambition for wind in Ireland over the coming decade is enormous as it requires us to more than treble the size of our wind energy production industry, adopt new technologies to the Irish electricity grid, and upgrade, reinforce, and build huge amounts of transmission equipment to bring renewable energy from where it is generated to where it is needed. This effort requires a regulatory regime that fully supports that ambition. Unfortunately, our current regulatory system inhibits this. The chief hindrance to meeting our climate goals is the absence of a planning system that facilitates offshore wind farm development. This needs to be the top priority at all levels of administration.

Solar is often seen as a quick fix to adding more power to the grid, but our concern is that the presumed ease with which such developments are assumed to enjoy is merely a result of the lack of large solar development plants, it is highly likely that large solar power plants will experience novel challenges as they progress through planning, and so the massively increased ambitons for this technology may contain a large amount of unaccounted for risk.

The same ought to be assumed of the proposed development of offshore wind farms, we are extremely concerned that the minimalist approach that is being taken to consents is likely to lead to an undershoot in terms of how much power is available to the grid in 2030. No extra capacity is being considered for projects that do not progress at the pace which is desired. This will likely lead to a higher than targeted reliance on fossil fuel thermal plants and so will prevent other sectors from being able to decarbonise at the rate that is hoped.

Consequently, we doubt the credibility of plans that aim to see 80% penetration of renewables in the electricity market by 2030.

2.What can be done to accelerate/facilitate the delivery/deployment of offshore wind and solar PV in particular, in the context of Climate Action Plan 2023 and the REPowerEU ambition?

We see great potential for Ireland in the RePowerEU instrument, which will be used to strengthen Europe's energy security, and aims to increase wind energy across the EU to at least 480 GW in 2030. Specifically, the "overriding public interest" clause should be of huge benefit to Ireland in securing planning for wind energy infrastructure. This will simplify permitting and ensure concerted action to strengthen our energy supply chains. However, it is the national grid infrastructure that is the overwhelming bottleneck. We should ensure that RePowerEU can also be applied to upgrading and reinforcing the grid as a matter of priority.

We welcome the decision to establish an Environment and Planning Court, however, implementation as soon as possible is pivotal considering the urgency with which our planning system needs to be overhauled. If the court is not established without delay, and adequate resourcing is not invested in the system, we will not develop the infrastructure we need to transition to a zero-carbon economy. Additionally, Ireland is still too slow to adopt other technologies into our energy mix. We reiterate our concerns regarding a lack of consideration of "Hybrid" energy projects. Given the enormous expansion of ambition for renewable energy projects is not going to abate over the next few years, it is likely that demand for renewables will overwhelm the capacity of our planned electricity grid upgrades. Our submission to the National Hydrogen Strategy goes into our position on this point in detail.

3.What role does renewable gas have in the power generation sector?

In the Climate Action Plan 2023, Chambers Ireland strongly welcomed the 5.7TWh target for indigenous anaerobic digestion biomethane as these targets were a strong improvement upon the earlier Climate Action Plans.

Diversity in supply will be key to ensuring that we have security of supply. Combining Wind/Wave/Solar/Battery/Hydrogen technologies – in addition to renewable biomass and biomethane options – will be core to delivering renewable energy to our electricity network while also ensuring security of supply.

4.What role could carbon, capture and storage have in decarbonising our power sector?

Continued development in the area of carbon capture and storage has considerable potential for job creation, alongside other key environmental and economic benefits. Primarily, using biomass, biowaste, farming and foodwaste to produce methane can maximise the lifespan of existing natural gas investments, while also reducing the impact that the naturally released methane would have on the atmosphere. Coupling them with carbon-capture technologies would turn such waste into net-negative feed that would allow for carbon sequestration however carbon capture technologies are unlikely to have significant potential in the short term though the technology should be kept in consideration for more longer-term projects.

6.What measures might be taken to improve the resilience of the electricity system to the impacts of climate change?

Accelerating the energy security transition is the Russian war on Ukraine, which has created an energy-shock that is driving short-run inflation but is also leading to a medium to long-run increase in the cost of fossil fuels as countries and businesses are forced to diversify their energy sources. Ireland has long been navigating its course in an increasingly shock-prone world. The impact of climate change is likely to cause further shocks in future of varying levels of severity. The need to build resilient electricity networks that can continue to deliver, and that can continue to support the needs of everyone on this island, is becoming ever-more apparent. Investing in grid enforcement measures that focus on increasing capacity and improving efficiency will ensure the resilience of the system to external shocks. The investment in the grid needs to be accelerated so that greater volumes of renewable energy can be integrated into our energy supply, this increase in renewable electricity will need to be complemented by an increase in the capacity of short, medium and long-term storage options, each of which will require a variety of different technology mixes.

7.What role do you see for electricity storage and demand-side response in providing flexibility to a system comprised of high renewable penetration and in supporting the decarbonisation of the electricity sector?

A successful energy transition will require that energy generation, demand-side response and storage must be optimised, but demand side management approaches should only be approached with caution because they often require/rely on consumer behavioural change. This is a challenging area which may result in resistance, merely because individuals are often opposed to changes that they feel are being forced upon them (regardless of the level of prior consultation). This suggests that the demand site changes that are ought to be either entirely voluntary, or effectively invisible to the consumer.

A large cohort of consumers are willing to consent to demand side behavioural change, but we need to be extremely careful in how this is delivered, there only needs to be one instance of people being unable to reach a make a long distance journey because an e-vehicle was on a slow charge for this programme to become an area of controversy in the media.

8.What financial incentives are needed to increase renewable generation capacity?

a. To incentivise commercial scale production.

Incentives in this space are already working well and providing value. They should be monitored and evaluated regularly to ensure they continue to provide value and stimulate commercial scale production. The constraint here isn't the desire to invest in commercial scale production, it's the capacity of the grid to accept new supply.

b. To incentivise microgeneration.

We need to see increased grid capacity for connecting small-scale and micro producers of renewable energy. The recent announcement by the SEAI of amendments to the existing Non-Domestic Microgeneration Scheme have been very welcome and represent an important step in the right direction. These amendments allow for the expansion of grant supports for installation sizes up to 1,000 kWp capacity – significantly above the 6 kWp limit previously under the scheme. This is a huge improvement and incentive for increased microgeneration.

10.What measures can ensure the security of electricity supply sustainably in a system with a high amount of variable renewables?

Given that our nearest EU neighbour has a low carbon electricity network, the limited capacity to connect into the EU grid, and the variability of wind, Ireland would be best suited to focus on energy storage to combat variability and excess export through Hydrogen.

Given our extensive Exclusive Economic Area, our sea territory offers us access to enormous volumes of renewable energy. It is however variable with suggests that projects that would link us to the EU grid will be limited in the utility – not least because much of that grid infrastructure will not be needed except for during peak periods. Fixing this energy in chemistry offers us a way to commercialise our energy potential, it also allows us to smooth out our own electricity supply to suit our highly variable daily demand curve.

12.What are the planning and permitting barriers to infrastructure development to support 80% renewables; such as new generation capacity, grid reinforcements and system services? How best can these barriers be removed or mitigated against?

There are many ways in which permitting and planning permissions are not integrated, particularly when it comes to the power infrastructure as each major project involves permissions from a variety of state bodies. As a consequence, gating is an issue. The Enduring Connection Policy (EPC-4) which commences this year will see the application window for Grid Connection open for two months. This means that where a developer seeks permission to add new capacity to the grid. The current procedure involves a need to make the application by September, with licensing being issued in April. However, if you miss the September deadline, then you effectively lose over an entire year until the next opportunity to be granted a license.

Beyond this, there are further issues. If a developer gets permission to establish a new grid connection, they can still find their application stuck in planning for years, and there is the risk that other licences (foreshore licences, DMAP access, Ministerial consents) will lapse in the time taken to pass through planning.

Industry

2.What measures can be taken to decarbonise high temperature heating in industry?

We can decarbonise high temperature heating in industry through zero carbon fuels including hydrogen, ammonia and biofuels. Our members are already calling for supplies of biomethane and hydrogen mixes in their combined heat and power units however, as yet, no supply is available.

3.What role could Carbon Capture and Storage (CCS) have in industry, and what steps would encourage its deployment?

Carbon capture and storage can be the first step for some industries in stepping away from fossil fuels, as it can be installed on power plants that run on coal, gas, biomass, or waste. In the US, the Inflation Reduction Act is expected to drive investment and deployment of these technologies in future. This may help improve accessibility and research and development within the sector.

At present however the technology has yet to scale to the degree that it is likely to become useful means of decarbonisation. The focus initially needs to be on the larger scale emitters such as the electricity thermal plants, as the transport chain for smaller industrial units to trap and store CO2 is unlikely to be remotely viable until these major producers have committed to CCS at scale.

4.What other opportunities exist to drive the decarbonisation of the industry sector?

Large energy users (particularly those in industries like aluminium smelting, cement manufacturing and agrifood) could be incentivised to transition to hydrogen (or a hydrogen/methane mix) to reduce our dependence on imported fossil fuels while also catalysing a Green Hydrogen industry.
The existing method of creating nitrogen fertiliser is dependent on superheating methane using the Haber-Bosch process. Green Hydrogen can be an alternative zero-carbon feedstock for this process for fixing nitrogen, which would not only facilitate the creation of a more environmentally sensitive fertiliser industry, but also one which does not carry the same geopolitical and price risks of our existing source of nitrate fertiliser.

6.Are there measures that can be taken to assist businesses sustain the additional operating costs associated with moving to new, low-carbon technology?

In the first instance, a business needs to understand the technology that is available and choose the best option for their business. They will need support in order to do this.
Secondly, they may need support in financing this new technology, as it is likely to be a significant investment and large undertaking.
Thirdly, they will need adequate support and training to introduce the new technology. This may require upskilling or reskilling their employees in order to manage new processes and optimise the technology for their specific uses.
Often the existing grants are not particularly useful to businesses as they direct businesses towards using certain products rather than assessing the outcomes. This results in many businesses chasing the same set of goods, driving up the costs and delaying the process. Our members are often face a situation where, having chosen to move on a low-carbon technology, the grants available are not useful because they'll can often get a substitute product, which is as effective, for less of an outlay, and more quickly if they do not use the approved product lists.

7.Are there areas of industry that Ireland should develop in response to climate change?

We have enormous opportunities to benefit from the exploitation of our renewable offshore energy resources, but we need far greater ambition to expand capacity, and a Green Hydrogen industry that operates at scale is critical to store this energy over periods of weeks and months.
With large economies of scale arising from servicing the large industrial, and electricity generation demands for Green Hydrogen Irish consumers will benefit from our European peers underwriting the creation of the infrastructure needed to capture the locally produced renewable energy and the supporting infrastructure that a Hydrogen industry will need.

Built Environment

1.What further supports can be put in place to address the split incentive when retrofitting rental properties (residential and commercial)?

Reforming the accelerated capital allowance (ACA)/retrofit tax incentive for landlords would offer further tax incentives for commercial landlords to retrofit their rental properties. Currently the ACA scheme only applies to energy efficient products and equipment, however, it would be positive to see this extended to retrofitting. The retrofit tax incentive for landlords only applies to small-scale landlords, for a maximum of two properties, and only applies to residential.

If these schemes are reformed or a new scheme is introduced, it would incentivise commercial landlords to retrofit their residential and commercial properties at the same time. This means that landlords will see a financial benefit and will be incentivised to improve the energy efficiency of their buildings, even where they do not occupy these spaces and will therefore not feel the immediate benefits of retrofitting.

2.How can we encourage SMEs to upgrade the energy efficiency of the buildings they own?

Specific and targeted advice on the benefits of energy efficient buildings is key. For most businesses and particularly SMEs, energy efficiency will become most applicable in a financial and cost-saving context. SMEs often don't know where to start and need support in making changes that can result in the best value for money in the long term.

Currently many SMEs may not be able to apply for the SEAI's energy audits due to the qualifying criteria. This criterion sets a minimum spend of at least 10,000 on energy per year. There are many SMEs that simply won't spend that much but could still benefit from an energy audit and could make changes to improve the energy efficiency of the buildings they own.

3.What immediate actions can we take to address the skills shortage in the construction sector, to facilitate meeting our annual retrofitting targets?

Addressing the skills shortages in the construction sector is crucial if we are to develop and progress key infrastructure projects and initiatives, including the annual retrofitting targets. Subsidised skills conversion courses and upskilling programmes delivered through microcredential accredited courses could provide easy first steps for individuals weighing up their career options and considering a change. It would also be useful to see increased exposure to construction opportunities at school age. This could be done in conjunction with the successful country-wide energy roadshows that have been taking place. Senior school students could be invited to attend and information could be provided on the career opportunities that are available.

Additionally, with increased investment being directed to modern methods of construction, we could be exploring how these new methods of construction could be applied to retrofitting to improve efficiencies and streamline the retrofitting process.

6.How can we further support local authorities to deliver on social housing retrofit targets?

It may be useful to establish local retrofit academies where local authorities can share information with one another on best practice examples. With overarching retrofitting targets levied against social housing, every local authority in the country will be struggling to manage and execute the task in the applicable timelines. Therefore, it is important for each local authority to share their successes and challenges for the benefits of others.

Secondly, a clear action plan is required to adequately establish the scale of retrofits that are required, assess particular needs from deep to shallow retrofits, enhance the procurement of retrofitting services, and implement the plan in a way that causes minimum disruption to residents.

7.In addition to the existing financial supports and policy measures, are there any other incentives/assistance needed to help homeowners upgrade the energy efficiency of their homes?

Fast-tracking shallow retrofits at scale would help households take immediate action to mitigate the effects of higher energy costs and ensure the retrofitting programme is as effective as possible. Delivering shallower retrofits would be better in line with a just transition, as it would support those most directly affected by fuel poverty.

The current focus of retrofitting is too heavily weighted in favour of deep retrofits. These are costly and require households to fund the upfront costs. They also may require the household to move out while works are ongoing. This may not be possible for many that cannot afford to find short-term rental accommodation or have nowhere else to go. However, more households may be open to carrying out shallow retrofits that can be rolled out relatively easily and are cost-effective.
Easier access to financing would also support households that want to carry out deep retrofits, as this would help bridge the gap until grants and funding can be processed.

11.What specific actions can the public sector take to improve the efficiency of its building stock?

The public sector should be leading from the top in terms of retrofitting and improving the energy efficiency of its building stock. In order to do this, there should be minimum targets put in place with relevant timelines applied.

12.What supports are required for the retrofit of traditional (pre-1940s) and heritage buildings?

Pre-1940s and heritage buildings are often town/city centre buildings, many of which are likely to be occupied by retail units. Specific consideration should be given to including supports for the owners of these buildings. They may require targeted audit processes with specialist retrofit engineers in order to utilise the latest technologies to improve the energy efficiency of the buildings.

14.What specific measures can be implemented to improve the efficiency of rolling out the National Retrofit Programme?

It would be useful to see accurate reporting and logging of retrofitting activities that have taken place in a central database. This will support knowledge sharing and information exchange across regions.

Transport

Avoid Measures

1.What improvements should be made to ensure transport-oriented planning and development (commercial and residential) is realised on a consistent basis to avoid further forced car dependency or lock-in of unsustainable practices?

The key to effective Transport-Orientated-Development is the capture of the uplift in value that is associated with the delivery of investment in public transport infrastructure. The uplift in land value can be used to defray the costs of investing in the public transport infrastructure and also allows for more land to be bought/invested in by state bodied.

This is in contrast to the typical capture of the uplift value that is associated with planning, where the value is transferred to either the initial landholder, or more likely to intermediaries between the original landholder and the ultimate developer of the site.

As the state is one of the largest landholders in the state there is a enormous opportunity for the state to conserve the value of the property that is being developed by transferring this uplift in value towards the investment is high capacity, frequent transit which can support the development of high-density housing in the locations where it is most needed.

To deliver an effective land management programme the state will however need to ensure that land that is in the environs of these investments are activated as rapidly as possible as possible too.
To do this the state must strengthen its hand regarding vacant, underutilised, and derelict sites. There needs to be stronger laws for compulsory purchase orders, compulsory sales orders and the transfer of vacant properties to the state, or else what will happen will be a continuation of the speculation that has inhibited the development of our cities and towns.

2.What changes should be considered in relation to the management of roads in urban centres to reduce congestion and support the prioritisation of more sustainable modes? (e.g. reducing speed limits, parking policy, higher parking charges, low-emission zones)

Reducing congestion itself should not be a target of public policy measures, congestion is a feature of uncentralised transportation systems and has little to do with the potential throughput capacity the system as individuals invariably act in sub-optimal ways which create turbulence.

The challenge with this road management policy as that there needs to be a viable alternative to the use of cars in these areas. In many urban areas cars account for only a minority of the commuters that are in transit in a given day, the congestion that is associated with them however limits the efficaciousness of public transport by creating congestion that drives up the time spent travelling.

The continuing reduction in parking spaces is likely to continue the trend of a smaller number of people driving into town centres. However, there needs to be an alternative mode of transport available before individuals will be able to take that decision.

More dedicated space for public transport which allows public transport to be the faster, and more reliable, transport option is essential for facilitating modal shifts. This can be effected with more light-rail infrastructure and the use of bus gates.

Reducing speed is unlikely to have a significant impact on congestion and roads as the urban speed limit is a multiple of the average travel speed. Reducing speed limits may have an impact on safety for other road users but only in so much as it leads to behavioural change on the part of drivers. As many national routes cross our cities and towns many of the roads in our urban areas are so wide that they induce higher speeds, and so it is unlikely that the mere reduction in speed limits will automatically result in drivers driving more slowly.

Much like the restriction in parking spaces, the alteration of speed limits, or the creation of low-emission zones (which is similarly unlikely to result in behavioural change, in and of itself) these measures need to be policed. As we have seen with the lack of enforcement of many traffic laws, having laws in place is not sufficient to preclude behaviours. Cities and towns should be empowered to use cameras to automatically fine those that break traffic rules which impose externalities on other. Cars that arrive at traffic junctions in times that would be impossible should they have abided by the speed limit should be automatically ticketed, those that block yellow boxes, run red lights, or otherwise obstruct other road users could face

similar penalties. It would be relatively simple to create software that can flag such cases, delete any footage which does not demonstrate illegal activities, and then remove edge cases such as those instances of potential infractions reviewed by people (who would also be able to remove situations where, for example, an individual commits an infraction to allow an emergency vehicle to pass), before the ticket is issued to the owner of the vehicle.

Similarly, the public could be empowered to report infractions such as illegal parking and other similar activities with an app that allowed them to take photographs and videos of such activities with the digitally signed timestamp and location data integrated into media file which could then be automatically uploaded and reviewed.

The revenue collected by such measures may compensate local authorities for the reduction in parking income, and so may align incentives between central government policies and the local governments that will be implementing them.

Consideration should also be put to whether there are alternatives to using a fossil fuel vehicle if low-emission areas are introduced as there may be many heavy goods vehicles, construction vehicles, and public transport vehicles that may not have a ready alternative available.

Of greatest importance in urban areas will be the creation of active travel infrastructure that allows people to make modal shifts safely. A huge number of the journeys that are taken are the short journeys to and from schools, shops etc. unless people with children in particular feel safe taking such journeys using active transport options, they are extremely unlikely to make significant changes to their transport behaviour.

3.What changes should be considered in relation to the management of Ireland's road network? (e.g. to charge motorists for distance or time spent travelling on the network)

The issue of greatest concern is the fiscal impact of the trend towards electric vehicles. With the reduction in VRT, motor tax, and Duty receipts for fossil fuel it is likely that the exchequer will see a reduction in revenue of at least €5.5 Billion per annum by the time that transition is complete.

Given the expense of electric vehicles it is probable that many drivers will maintain their internal combustion vehicles until that point where there is broader range of electric vehicles on the market and the cost of replacing batteries is much reduced (a major disincentive to purchasing a second-hand electric vehicle). This means that the duty which is returned to the exchequer as a result of the sale of petrol and diesel is not likely to fall as precipitously as the vehicle registration taxes, which may blunt some of the impact of the electrification of transport.

It is important that changes to road use policy do not result in altering behaviour in unintended ways and should new charges be introduced they would need to apply to all motor vehicles on the road regardless of source the energy. It is also probably that even if we were to charge for road usage, the income generated is not likely to be equivalent to the overall loss in VAT, VRT, and Duty, primarily as a result of the need to incentivise the use of electric vehicles to reduce our carbon emissions. It may be reasonable to impose per kilometre charges on vehicles which account for their weight, and with different scales for commercial and private vehicles.

There is also the opportunity to rebalance some of the inequities of the existing system. Private vehicles are less prevalent in urban areas and so urban local authorities are forced to service a large quantity of heavily used roads garnering without the associated motor taxes.

Some local authorities could benefit from being allowed to set tariffs for periods of time spent within high congestion zones which would differentiate between vehicles that are based there, and also those that are for commercial use.

4.What potential do blended working policies or remote working hubs have to help reduce commuting travel and transport emissions?

The benefits of remote working hubs are likely to be limited. There are different working styles and business processes that account for the utility of remote and flexible working practices. Similarly different workers may have different preferences regarding hybrid working. It is probable that people based in urban areas are likely to have less living space which may make working from home less favourable, similarly younger people (who are predominantly urban) are more likely to be living in house shares which could make working from home less attractive, but if they are to leave home to work they are much more

likely to commute to work than to go to a remote hub. Remote hubs are only going to be attractive to people who have a significant commute, though those same people are also likely to have much more space at home giving that suburban and commuter towns skew towards houses rather than apartments. As a result, it is likely to be the case that there will only be a limited appetite for the use of working hubs. This is probably a population that lives in the commuter belts/regional areas, and cannot work from home, in which case most will be people who have children and are living remotely and are commuting that will find hybrid working as older people in those locations will be able to have home offices.
Flexible working arrangements will be of greater importance when it comes to reducing the need for commuting. It would be useful to if the Department of Enterprise and the WRC, in combination with relevant stakeholders, were to draw guidelines for businesses that wish to use flexible working practices in their workplace.

5.What potential do digitalization, innovation and efficiency improvements in the commercial sector have to deliver further emissions abatement in transport? What are the barriers to delivery of each?

Grid infrastructure is the greatest limiter, we have members that have bought electric vehicle fleets, but the high voltage quick charging capacity is not available to facilitate speedy introduction of these vehicles. There are limited options when it comes to sustainably originated fuels and duties on biofuels make their use uncompetitive.

Digitisation can have its benefits when it comes to honing logistics, though this can only have a major effect with businesses that have larger fleets which are the low hanging fruit when it comes to energy transition as it is the smaller firms that face the greatest hurdles. Smaller firms are unable to hire dedicated staff with the skills to guide them towards more sustainable and cost-effective solutions.
For transport firms the greatest barrier is likely to be the availability of electric vehicles, heavier vehicles need much larger batteries to for longer routes, and given that batteries are the most expensive component in an electric vehicle producers are incentivised to sell many smaller high margin vehicles than a small number of large vehicles. There are other sustainable options, including biogas, hydrogen, synthetic fuels etc. but there will be a lag before they will be available in large numbers and smaller businesses in particular will be slow to shift for fear of being left holding the wrong technology once the market has determined what the best option is.

Shift Measures

6.How can the delivery of physical infrastructure, such as public transport projects, cycle lanes and urban road space reallocation be more effectively accelerated?

Local authorities need to prioritise the delivery of them. Traditionally the roads section has been the most powerful department within local authorities, and they are typically manned by engineers that have cars as central to their decision-making processes. There needs to be a rebalancing of interests internally within the local authorities to ensure that there is human-centric decision-making at all levels. Cars can have a considerable negative impact on public space and have been extremely detrimental to urban areas. The signage, the lights, the bollards, the mini-henges of traffic control boxes all affect the built heritage of our cities and towns while diminishing their tourism value.

To deliver these projects the challenge is not one of engineering expertise, it the winning of hearts and minds in local areas. It's never going to be possible to win everyone over, there will always be a section that will be against any change which is occurring, and this has to be accepted, but the work needs to be done at a local level to demonstrate that the changes that are being introduced will benefit the community that is being discommoded during the transition. Its difficult work because it needs to listen to the problems in the community and then demonstrate to them how the changes that are being introduces will ameliorate the problems in their community.

It would be worthwhile not introducing new plans over the next 12 months to reduce their likelihood of becoming issues in the local elections in 2024, but instead use that time to create a suite of projects that can be rolled out and implemented in the period from June 2024 to 2028.

7.What measures and supports are needed to ensure the effective development of shared mobility options and hubs?

They need to be integrated in the way that public transport fares in Dublin have been integrated with the leap card. If there was one transport card that could be used by any of the operators in the country this would greatly facilitate the ease of use for customers.

8.What additional measures should be considered to improve the quality or attractiveness of public transport or active mobility solutions as an alternative to private car use?

The key issues are frequency and reliability. If someone is using public transport for commuting it absolutely has to be reliable, if people feel that they may not be able to get to work on time they will not use the service. As a result there needs to be a very low tolerance for public transport delays, no-shows, and being full.

One of the side effects of the increased cost of transport over 2022-2023 has been a major shift towards the use of public transport though for many there are problems with busses being full and therefore not stopping as they cannot pick up more passengers, on some train services like the commuter train to Galway, individuals are diving to Athenry because the train is full by the time it arrives in Oranmore which can lead to an increase in milage (even if there is less time spent in traffic jams).

There needs to be an increase in the number of buses and trains, with a commensurate increase in staff to ensure that they are available at an increased frequency.

The physical fabric of many trains and buses is poor and their replacement has been delayed by Covid. The benefits for annual passes are skewed towards people on higher incomes that are paying the higher level of tax, and are more likely to be salaried rather than waged which means employers are more likely to facilitate them taking advantage of the scheme. Also the cost of journeys on Bus Eireann routes is prohibitive when travelling day to day, those costs combined (the difficulty for lower income people when it comes to buying an annual pass affordably, and the high marginal cost of a bus) lead to people on lower income relying on their own vehicles.

Rail routes along spur lines need to be better synchronised with main line trains if they are to be relied upon, no one wants to be waiting for 45 minutes in Mallow, Limerick Junction, or Manulla for a connection.

For many women, one of the key benefits to driving is the sense of security they feel when they can get into their car and lock the doors. If public transport options are to be as attractive as using a car then they need to be as safe, and one of the main fears they experience is being at a remote location late at night

waiting for a bus or train. It is therefore essential that, if women are to be frequent users of public transport, that they are frequent in the later hours and completely reliable.

9.What expectation or level of public transport service is appropriate in rural communities and what other key measures can support a transition to sustainable modes?

For many people in rural areas the only way to travel sustainably will involve owning an electric vehicle. For our members many are happy that the Rural Link has been introduced, but their clientele are not people working and skew towards the elderly. Unless people in rural areas have reliable transit that can bring them to work in the morning they can only rely on private transit.

10.What policies or measures can be considered to further incentivise the use of more sustainable modes of transport for education and leisure-related journeys?

There is strong support for the reduced transport fares for younger people and those in education, particularly in the NTA services, these should be extended to Bus Éireann routes beyond the Greater Dublin Area.

Improve Measures

11. What specific measures should be applied to deliver additional emissions reduction and improved energy efficiency in the transition of our vehicle fleet from fossil-fuels?

Reduce duty on diesel substitute biofuels, such as VSO, and maintain it for other biofuels.

12.What specific measures should be applied in the commercial transport sector to encourage or accelerate a change to EVs or to other zero carbon alternatives?

Accelerated Capital Allowances, removal of the BIK for electric vehicles for employees.

13.What specific actions can government take to help create a robust second-hand market for electric vehicles

A robust second-hand market for electric vehicles will rely on the affordability of replacement batteries for second hand electric vehicles, the government should look to reducing the cost of replacement batteries by excluding them from VAT etc.

Open

14. How important is the role of public engagement and communications in encouraging individual behavioural change, and what forms of engagement are considered most effective? What more can be done to demonstrate the benefits of modal shift?

There needs to be champions that can demonstrate that the public transport option is affordable, pleasant and reliable. But for these champions to do this credible the experience of the customer has to beat their existing low expectations. It takes 2.5 hours to get to Carrick on Shannon from Dublin on the train, it's quicker by car. It takes more than 3 hours to get to Galway on the train, that is significantly more than you can do it by road. The Limerick connection train is almost invariably late. The Ballina train bleeds diesel fumes into the carriage. The Dublin Wexford train doesn't have tables or power connections. It is impossible to get from Dublin to Cork before 10 am in the morning. There are different problems on different modes of transport, but all forms of public transport have significant shortcomings (whether it's the luas stopping too early, or Bus Éireann only accepting Leap cards on certain routes)

Agriculture

3.What can be done to maximise the use of grass, manure, and silage as feedstock for biomethane generation or for processing through biorefineries?

Studies have shown that Ireland has the highest potential for biomethane production per capita within the EU, with a potential of 13 TWh achievable by 2030. By mobilising Anaerobic Digestion it could generate €1.5 billion in direct investment and 3,600 new permanent jobs, in many cases in rural environments. It can also significantly boost the country's green credentials and enhance our attractiveness to foreign direct investment. With Anaerobic Digestion we can make a significant impact on the sustainability of the

energy that we consume, utilising the resources that currently exist in agriculture, wastewater treatment and food systems into energy.

Land Use and Forestry

1.What can be done to increase sequestration through forestry (afforestation, extended rotations, and improved forest management)? How can landowners/land managers be supported to take up these practices?

We welcomed the proposed funding of 1.3 billion for Irish forestry under the new forestry programme, as it represents a very substantial and significant investment that should send a strong signal to the sector and potential investors.

We support the positioning of forestry as a service. Our national network of forests can have an abundance of positive impacts on many different areas of society. Forests can play a very important role in protecting our water sources, supporting biodiversity, promoting tourism, and improving the health and wellbeing of communities.

It will be important as part of the Climate Action Plan and the National Forestry Strategy to monitor uptake and engagement with farmers on potential barriers to accessing funding. Investment in the forestry sector will only happen with adequate and easy access to funding and support.

2.What opportunities are there to rehabilitate our peatlands and wetlands, and what can be done to realize these opportunities? How can landowners/land managers be supported to take up these practices?

The state will have to take more action to restore our peatlands. This will be critical to reducing our carbon emissions, especially as 16% of Ireland is covered by peatland. The potential exists for our bogs to play a main role in reducing our emissions, however this will only be possible if the political will exists to do likewise. Peatlands are our largest store of terrestrial carbon and represent a nationwide land-use, and yet the importance of rewetting of our peatlands to enable sequestration is not universally acknowledged.

Unfortunately, short-term thinking has dominated policy in this space. For example, the most recent available data from the CSO shows that almost 5% of Irish peat bogs have been affected by drainage works under Arterial Drainage and Drainage Districts schemes. Undoing this situation alone constitutes a considerable challenge but is a matter of obvious priority.

In relation to waterways, forests have been proven to reduce the leaching of nutrients from agricultural soils, which can have a negative impact on the quality of water supplies in an area. They can also help regulate floodwater and reduce soil erosion. As outlined in our submission on the fourth National Biodiversity Action Plan, narrowing our land use over time has meant that our land has become less effective at retaining water, which amplifies both the impact of droughts and the effects of flooding. Similarly, resinous monocrop pine plantations on dry peat soils are likely to be especially vulnerable to fires and this can result in the significant emission of greenhouse gases through the accumulation of carbon as the thick fuel soils burn.

The Marine Environment

1.What sort of role could Ireland's marine environment have in delivering climate mitigation? What are the building blocks that need to be put in place to support the role of the marine environment in climate mitigation (e.g. a regulatory framework, measurement and accounting rules)?

The marine environment represents one of the most important elements in our renewable energy policy. The careful management of which has the potential to accelerate our green transition. We need to be ambitious, while balancing the protection and promotion of marine biodiversity with the need to extend our renewable energy production potential.

In our submission on the Marine Spatial Planning Consultation, our main concern was that the department would not have the capacity to designate a wide enough range of territories as being appropriate for the delivery of offshore wind farms and this is clearly having an impact on our capacity to meet our renewable energy targets.

There seems to be a deep lack of understanding at the administrative level regarding how much they are curtailing the potential for electricity generation by limiting the areas where it can be allowed. Even before the U-turn it looks as though we would be unlikely to meet the original 3.5GW targets, never mind the 5GW targets in the Climate Action plan. Similarly, the slow rollout of the Marine Area Regulatory Authority is incommensurate with these increased ambitions, and while the staffing of the authority is increasing it seems as though it there is a dearth of technically competent individuals being hired as the vast majority of the roles being filled are being secured by generalist officials that do not have the domain expertise that is needed to make adequate decisions in a timely fashion.

We need to be more ambitious in creating an open regulatory framework that promotes innovation and renewable energy production, while still protecting our marine biodiversity.

The Circular Economy and Other Emissions

1.What are the main barriers to consumers embracing the Circular Economy, e.g. lack of awareness, increased costs compared to disposable products, lack of access to circular goods and services?

Lack of awareness is a key barrier. This can be due to a lack of credible information or the proliferation of contrasting and competing information from different sources.

We welcome the planned EU Directive to empower consumers for the green transition. This will help reduce greenwashing and ensure that information on products and services accurately reflects their green credentials and is not misleading. This should ensure consumers are better informed about any purchases they may make.

2.What other opportunities exist to support decarbonisation through the acceleration of a transition to the circular economy?

Empowering consumers to make better decisions about the products they buy and consume is an important step in ensuring that sustainable action is taken across all levels of society, from the individual to government level. If consumers can confidently choose products that are more sustainable, this rewards companies that are doing the right thing, drives competition around greener products, and can shift whole sectors and markets toward sustainability, which is a positive driver under the green transition.

Managed well, the transition to the circular economy will have major benefits for the labour market, including the creation of job opportunities and reducing inequalities through a redistribution of value.

Just Transition

1.Are there are any emerging areas of vulnerability in specific sectors of the economy as a direct result of the implementation of Ireland's climate action policies?

From a business perspective, we need to promote opportunities and encourage climate action by SMEs. We can see that larger businesses are able to employ sustainability and climate action specialists to lead out on their corporate sustainability agenda. Smaller businesses do not have this capacity.
Climate action is intrinsically linked with increased digitalisation. Ensuring a smooth twin transition requires coordinated supports for businesses.

3.How should Local Authorities seek to integrate just transition considerations into the preparation of their statutory Climate Action Plans?

Collaboration and consultation at a local level is crucial. For example, local chambers of commerce have strong links with the local business community and can relay feedback from SMEs and other businesses on the impact of local authority climate action plans.

4.Are the proposed functions for the Just Transition Commission appropriate?

It is appropriate to have the functions of the Just Transition Commission linked to the four principles of the Just Transition Framework.