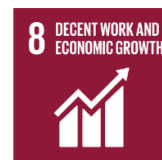




**Chambers
Ireland**
Advancing business together



Update to the Climate Action Plan – Climate Priorities

August 2026

Contents

About Chambers Ireland	3
Our Perspective	4
Questions	5
In Ireland's Greenhouse Gas Emissions Projections 2025-2030, the EPA now projects for the first time that we are close to meeting our first carbon budget, following a consistent trend of improving projections for that budget over recent years. In your view, which policies and measures have been the most successful in reducing Ireland's GHG emissions?.....	
	5
Among the measures identified in Climate Action Plan 2024 and Climate Action Plan 2025, which do you consider the highest priority to close the gap to 2030?	
	8
In the key sectoral areas identified (Electricity, Transport, Industry, Buildings, Agriculture and Land Use), what additional actions to those already in CAP 24 and CAP 25 could, in your view, accelerate delivery in these areas	
	9
In addition to the priority areas you have already identified in previous questions, which other areas should this update to the Climate Action Plan focus on?.....	
	13
The Joint Oireachtas Committee on Climate, Environment and Energy published a Report on Barriers to Achieving Climate Targets (2026-30) in February. Do you agree with the findings of this Report? What other barriers to achieving the climate targets, if any, would you identify? How best can the identified barriers be addressed?	
	15
The principles of a Just Transition (evidence-base and structured; skills and opportunity; fair sharing of costs; social dialogue and lived experience) are explained by the Just Transition Commission. What are your views on how these principles can be incorporated into the next CAP or climate action more generally?	
	17
The National Adaptation Framework and the Sectoral Adaptation Plans have been published. To what extent should further climate change adaptation measures be included in the next CAP?.....	
	19

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 Perspective

The next Climate Action Plan should prioritise delivery. Policies, infrastructure and business supports must be put in place at the pace required to enable compliance with the State's climate objectives while protecting competitiveness. Member feedback consistently identifies the principal constraints as infrastructure delivery, grid capacity, planning and consenting delays, transport connectivity, affordability and shortages in the skills required for the green transition.

These constraints are interconnected and directly affect competitiveness across the economy. Unless they are addressed, the State will find it more difficult to meet its 2030 and longer-term climate targets and may lose mobile investment to competing jurisdictions. The State's climate ambitions will therefore depend as much on its ability to deliver projects as on the targets it sets.

The next Climate Action Plan should prioritise implementation over the creation of additional measures. The State should also accelerate grid, renewable energy, transport and adaptation infrastructure; provide multiannual funding certainty; strengthen delivery capacity; and ensure that SMEs can access affordable finance, advice and practical decarbonisation supports. Climate action should be treated as a competitiveness and regional-development priority, with clear ownership, milestones and public reporting for major actions.

Questions

In Ireland's Greenhouse Gas Emissions Projections 2025-2030, the EPA now projects for the first time that we are close to meeting our first carbon budget, following a consistent trend of improving projections for that budget over recent years. In your view, which policies and measures have been the most successful in reducing Ireland's GHG emissions?

The improving outlook for the first carbon budget is positive, however it should be interpreted carefully. Current projections indicate that the first carbon budget is close to being met, while the 2030 emissions reduction under the "With Additional Measures" scenario remains 25.4% which is well short of the 51% target.¹

Local initiatives

In terms of initiatives, our members see significant value in those that encourage leadership and facilitate shared ownership of climate action at a local level. This helps turn national ambitions into tangible outcomes on the ground. Initiatives such as the EU Climate-Neutral and Smart Cities Mission, Local Green Deals and the Just Transition programme have been highlighted by our members as useful tools in helping them play their part at a regional level and raise awareness of the importance of climate action locally. Additionally, local authorities in many areas collaborate with their local chambers in driving positive change and delivering tailored sustainability action plans in their area.

To maximise their impact, these initiatives should be supported by stable funding streams that enable long-term planning and maintain momentum over time.

¹ The second carbon budget is still projected to be exceeded by 53 to 81 Mt CO₂eq, depending on the scenario.

<https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf>

Electricity

Ultimately, progress in electrification will be the most significant driver of progress toward meeting our climate targets. Only a rapidly expanded and modernised electricity system can accommodate the large volumes of new wind and solar generation and enable households, transport, and industry to transition from fossil fuels to clean power.

While progress has been made, a significant number of renewable energy projects remain stuck in the development pipeline. The next Climate Action Plan should prioritise the delivery of projects already in train and ensure that existing commitments translate into operational capacity. Renewable electricity, particularly onshore wind supported through schemes such as the Renewable Energy Support Scheme (RESS), has been one of the most significant contributors to emissions reductions to date. Ensuring consented projects become operational before 2030 should therefore remain a key priority.

This is further supported by the fact that the deployment of renewables in electricity generation is projected to provide the largest cumulative emissions saving of any quantified policy or measure for 2025 to 2030, at 49.11 Mt CO₂eq.² In addition, the impact is visible in the available data: electricity emissions in 2024 were the lowest on record which is down 8.3% on 2023 levels, while renewable electricity reached 41.3% of electricity demand. This demonstrates the value of long-term policy certainty, route-to-market support and private investment where the regulatory framework is workable.

Energy Efficiency Measures

Energy efficiency measures have been effective to because they reduce emissions and operating costs at the same time,³ however more should be done to promote them. Long-standing

² <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf>; and <https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland>.

³ For example, the Energy Efficiency Obligation Scheme is projected to deliver 7.31 Mt CO₂eq in cumulative savings from 2025 to 2030, while carbon tax is projected to deliver 6.69 Mt CO₂eq over the same period:

measures such as the Accelerated Capital Allowance have proven effective in reducing the cost of energy efficiency investments for businesses. Business-facing supports, including upgrade grants, capital allowances, advisory supports and programmes for SMEs remain important because many businesses – especially those who do not have the requisite turnover to foot the upfront capital costs associated with such measures – face significant upfront cost, knowledge and capacity barriers when investing. This is represented in the data which shows consistent and increased engagement⁴ by businesses with energy audits to evaluate energy usage and opportunities for savings.

Transport

There has been some progress in terms of transport, mainly through increased use of biofuels and vehicle electrification. In this context, measures work best where they are matched by infrastructure availability, affordability and credible alternatives to private car use.

Approximately 88–99% of transport energy still came from fossil fuels in 2025, while energy demand from private cars and HGV road freight increased. Making ports freight-ready and strengthening rail freight connectivity will therefore be critical to shifting goods from road to lower-emission modes and decarbonising supply chains.

Electrifying commercial fleets is among the most immediately achievable decarbonisation measures available to businesses. Government should communicate the business case and available supports more effectively to increase uptake.

As an example, support is already in place through the ZEV Workplace Charging Scheme, which covers up to 60% of the cost of installing charging infrastructure and reduces a key barrier to fleet electrification.⁵ Increasing awareness and therefore uptake of such existing supports offers

<https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf>

⁴ <https://www.seai.ie/news-and-events/news/home-energy-upgrades-applications-increase>

⁵ <https://irish-energy.ie/business-ev-grants/>

a practical and near-term route to reducing emissions while also lowering operating costs for businesses.

Among the measures identified in Climate Action Plan 2024 and Climate Action Plan 2025, which do you consider the highest priority to close the gap to 2030?

Rather than introducing a significant number of new measures, the priority should be accelerating the delivery of existing high-impact actions and removing the barriers preventing implementation. The next plan should focus on the systems that enable delivery, particularly long-term funding certainty, infrastructure planning, regulatory certainty and the capacity of public bodies to implement projects at pace.

In terms of specific measures, the Energy Efficiency Obligation Scheme (EEOS) should be reinstated as a named priority measure in the next plan, given its importance in closing the gap to 2030. Continued investment in supports such as the Business Energy Upgrades Scheme, SEAI programmes, and Enterprise Ireland and Local Enterprise Office initiatives is also important to help businesses, particularly SMEs, access funding, reduce the upfront cost of investment, build capacity, and undertake decarbonisation projects.

At a high level, priority should be given to:

1. **Providing multiannual funding** for infrastructure and decarbonisation projects, to enable agencies, local authorities and relevant stakeholders to plan and invest over longer time horizons.
2. **Accelerating renewable energy and grid infrastructure delivery**, while recognising that renewable generation, transmission, distribution, storage and demand management must be developed in parallel.
3. **Ensuring planning and consenting reforms translate into faster project delivery in practice**, with more predictable timelines for nationally significant infrastructure, renewable energy and climate-related projects.

4. **Expanding energy efficiency measures for businesses**, particularly for SMEs, through accessible advisory, finance and grant supports.
5. **Supporting practical decarbonisation pathways across sectors**, including electrification, renewable gases, storage, demand response and other technologies where appropriate.
6. **Improving the delivery of sustainable transport alternatives**, particularly in locations where public transport and active travel options remain insufficient.

In the key sectoral areas identified (Electricity, Transport, Industry, Buildings, Agriculture and Land Use), what additional actions to those already in CAP 24 and CAP 25 could, in your view, accelerate delivery in these areas

Multiannual funding should be prioritised to provide certainty for climate-related infrastructure and decarbonisation projects. Long-term funding commitments should support faster delivery of grid infrastructure, public transport, renewable energy, retrofitting and EV charging networks while giving businesses and public bodies the confidence to invest.

Electricity

Electricity is the enabling sector for wider decarbonisation. Faster renewable deployment will not be sufficient unless grid capacity, storage, flexibility and demand management are delivered at the same pace. Renewable energy is currently not being rolled out quickly enough and insufficient grid investment means that a portion of renewable generation cannot be used.⁶

Key Actions:

- Implement multiannual funding structures for the Distribution System Operator and the Transmission System Operator.
- Establish a national grid and renewables delivery programme with public reporting on key transmission, distribution, storage and connection milestones.

⁶ <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Electricity-FINAL.pdf>

- Use anticipatory grid investment where future demand and renewable generation are likely, rather than waiting for constraints to emerge.
- Accelerate hybrid connections, storage and demand response where they reduce pressure on the public grid and enable earlier emissions reductions.
- Implement renewables acceleration areas quickly, supported by early environmental screening, community engagement and clear permitting timeframes.
- Embed climate resilience into electricity investment, including weather-related outage metrics and adaptation measures for critical energy infrastructure.

Transport

Transport policy needs to be practical and focused at all levels on reliable alternatives to private car use. Where public transport is infrequent, disconnected or unavailable, private car dependency will persist.

Improved public transport services can play a significant role in reducing car dependency and supporting more sustainable travel. However, in many growing towns and urban centres, including those marked for growth under the National Planning Framework, transport provision has not kept pace with population and employment growth.

Reversing this trend will require delivery of the All-Island Strategic Rail Review recommendations, expanded Local Link services, connected active-travel networks, and timely progress through planning and construction for major projects such as MetroLink and Cork Luas.

Key Actions:

- Provide certainty and timely delivery for major capital infrastructure projects.
- Frontload bus services, school transport, town services, rural connectivity and fleet electrification.
- Ensure active travel schemes are connected, safe and sequenced with public transport and road management so that they reduce congestion.

- Provide regional EV charging plans covering town centres, apartment blocks, terraced housing, logistics hubs and commercial premises.
- Develop a clearer freight pathway, including electric HGV readiness, logistics efficiency, rail freight, renewable fuels and BioCNG where suitable.
- Prioritise implementation of rail and public transport connectivity recommendations, especially where communities lack credible alternatives to car use.

Industry

Three priorities will help industry decarbonise, lower energy costs and remain competitive: accelerating industrial access to renewable energy, supporting clean-technology innovation and expanding finance for industrial decarbonisation.

Firstly, energy-intensive industries urgently need to accelerate their transition to renewable energy. This encompasses a range of sectors and a wide variety of businesses including large manufacturers and large energy users, to food producers and other industrial users. The State should promote practical supports for electrification and decarbonisation at an industrial scale. Failure to do so will mean that many businesses will struggle to make the transition at the pace required while remaining internationally competitive.

In addition, the next plan should further support mechanisms that accelerate investment in renewable generation, including Corporate Power Purchase Agreements (CPPAs) and carbon sequestration projects. These mechanisms can help large energy users secure long-term access to renewable electricity and provide greater certainty for project developers, while unlocking additional private investment in renewable generation. There is also an opportunity to empower public bodies to act as exemplars by facilitating their participation in such arrangements, and enable them to make a greater contribution to public sector climate targets while supporting the transition to net zero emissions by 2050.

Secondly in terms of the clean tech sector, the State should promote innovation as a core aspect of the next plan. If we are to deliver on our climate objectives over the next few years, it will be the businesses that invest in and undertake the research and development of new technologies

that will be a core facilitator of that process. Accordingly incentives should be in place for such companies that reward research in this area.

Thirdly, financing for industry should be a core area for consideration. The Clean Industrial Deal will mobilise over €100 billion to support EU-made clean manufacturing and state aid rules have been broadened to help facilitate industrial decarbonisation and clean manufacturing at a larger scale. It is critical the State utilises these tools effectively.

Key Actions:

- Maintain momentum towards the timely delivery of the North-South Interconnector.
- Expand low-cost finance, technical assistance and grant aid for industrial electrification, energy efficiency, renewable heat, onsite generation and storage.
- Support the wider use of Corporate Power Purchase Agreements (CPPAs) and other market-based mechanisms that facilitate additional private and public investment in renewable generation and carbon sequestration projects.
- Develop industrial decarbonisation roadmaps that identify site-level grid, heat, storage, gas, water and planning needs.
- Support new and innovative green technologies for hard-to-electrify use cases, provided support schemes are bankable and targeted.
- Utilise public procurement to create demand for low-carbon materials, circular construction products and cleaner industrial processes.

Buildings

More flexible routes to decarbonisation should be considered for buildings and making retrofits more accessible should be the overarching theme.

Key Actions:

- Create staged retrofit pathways for homes and commercial buildings, allowing shallow and medium-depth upgrades where deep retrofit is not immediately feasible.
- Reform commercial retrofit incentives so landlords and occupiers can both benefit from energy improvements.

- Review energy-audit eligibility thresholds so smaller firms can access advice where practical improvements are available.
- Expand support for heat pumps, district heating, rooftop solar, battery storage and building energy management systems.
- Integrate adaptation into retrofit, including flood resilience, overheating, ventilation and backup power for critical services.

Agriculture and Land Use

Consistent with our point elsewhere regarding using a mix of technologies, we encourage the appropriate use of new and emerging technologies in the agricultural sector.

Key Actions:

- Implement a bankable biomethane delivery framework, including revenue certainty, connection arrangements, sustainability rules and clear demand signals.
- Support storage and community energy projects where grid access allows.
- Provide greater policy certainty on forestry, rewetting, native woodland, carbon sequestration and land-use choices.
- Integrate biodiversity, water quality and flood management so that land-use measures support mitigation and adaptation together. This should be a specific area of focus given the increased risks of future flooding events occurring arising from climate change.

In addition to the priority areas you have already identified in previous questions, which other areas should this update to the Climate Action Plan focus on?

The next update should focus on the systems that determine whether climate policy is delivered. This should include a stronger emphasis on coordination as a cross-cutting priority and a greater focus on implementation. Given the historic underinvestment in infrastructure throughout the State, sequencing infrastructure ahead of demand and in line with projected population growth should be prioritised. Consistent with our earlier point, facilitating and implementing multiannual funding needs to be a core area of focus to enable public bodies to deliver on their objectives.

The next Plan should also have a more integrated approach to the Sustainable Development Goals (SDGs). While previous plans include dedicated chapters mapping measures against the SDGs, greater value would be achieved by embedding relevant SDG targets directly within sectoral actions and objectives.

A practical delivery framework should be added to the Plan. For each major action, it should identify the owner, funding source, planning dependency, grid dependency, skills requirement, legislative requirement and delivery date.⁷ The Plan should distinguish between actions completed, infrastructure delivered, emissions reduced and private investment mobilised and include a dashboard for delivery focussed on grid, renewables, public transport, retrofits, SME supports, EV charging, storage and adaptation.

In addition circular economy and biodiversity measures should be better integrated across the sectoral chapters rather than treated separately. As examples, this could include:

- flood management,
- biodiversity gain in infrastructure projects,
- the reuse of buildings,
- low-carbon construction materials,
- secondary aggregates; and
- repair, reuse and remanufacturing.

There is also scope for the Plan to place more emphasis on adopting climate technology and digital delivery tools. Smart metres, demand flexibility, logistics optimisation, energy management systems, grid forecasting, climate risk analytics and AI-enabled infrastructure planning can support emissions reduction and productivity.

⁷ This is supported by OECD analysis which has identified the need for Ireland to shift from planning to implementation, with effective prioritisation and sequencing of investment across sectors: https://www.oecd.org/en/publications/oecd-economic-surveys-ireland-2025_9a368560-en.html

The Joint Oireachtas Committee on Climate, Environment and Energy published a Report on Barriers to Achieving Climate Targets (2026-30) in February. Do you agree with the findings of this Report? What other barriers to achieving the climate targets, if any, would you identify? How best can the identified barriers be addressed?

The Committee's findings broadly align with member feedback. The 30 barriers identified in the report⁸ are consistent with concerns raised through member input on grid capacity, public transport alternatives, active travel sequencing, infrastructure delivery and the need for a whole-of-government approach. There are also a host of issues relating to licencing, planning, consenting and zoning that undermine onshore renewable energy schemes, including solar and wind projects, which could deliver significant volumes of renewable energy. These are items which we raised during our engagement with the Committee last year⁹.

In this context, the areas that have been pinpointed for significant population and economic growth under the National Planning Framework¹⁰ and National Development Plan¹¹ have yet to see the scale and pace of infrastructure delivery required to support that growth. This includes critical infrastructure that is essential not only for regional development but for achieving Ireland's climate targets as well. Such challenges stem from a range of systemic barriers – as laid out in our submission - that continue to impede infrastructure delivery across the State.

⁸ Including unallocated emissions savings, grid and storage constraints, large energy demand, planning and consenting uncertainty, port infrastructure, transport delivery, EV charging, HGV decarbonisation, fragmented business supports, high electricity costs and low visibility of transition costs for businesses:

https://data.oireachtas.ie/ie/oireachtas/committee/dail/34/joint_committee_on_climate_environment_and_energy/reports/2026/2026-02-05_report-on-barriers-to-achieving-climate-targets-2026-30_en.pdf

⁹ https://data.oireachtas.ie/ie/oireachtas/debateRecord/joint_committee_on_climate_environment_and_energy/2025-10-15/debate/mul@/main.pdf

¹⁰ <https://www.npf.ie/>

¹¹ <https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/national-development-plan/>

Social and community aspects should also be considered. Some of the most significant barriers to securing public support for climate action - and therefore attaining our climate targets - are centred around challenging accepted norms and changing societal behaviours. It is essential the State leads in this area.

As an example, when communities are planned without integrated public transport networks and active transport links, the State relies on people using cars to fill in the gap where those services ought to be. Similarly, when housing estates are built with no pedestrian access to shops and schools, that is the State locking in decades of transport associated CO2 emissions. Compounding this is the fact that sectoral emissions ceilings are not being met. Reversing these trends will require leadership from the State in acknowledging the environmental cost of continuing the status quo and actioning outcomes that are conducive to each sector moving toward net zero.

Additional Barriers and Key Recommendations

- **State delivery capacity:**
 - Multiannual funding certainty for grid, storage, water and wastewater treatment, transport, ports, retrofitting and adaptation is essential.
 - Planning authorities, consenting bodies, regulators, local authorities and delivery agencies require sufficient staffing, expertise and systems.
 - A climate infrastructure delivery office or equivalent cross-government mechanism should be examined with authority to resolve delivery blockages.
 - Statutory timelines for planning, consenting and grid processes should be matched with adequate resources.
- **Infrastructure sequencing:**
 - Energy, transport, water and wastewater, and port infrastructure are often planned in parallel but not delivered in the right order.
 - Quarterly public reporting should be implemented on major infrastructural milestones.

- Renewables acceleration areas and RED III permitting reforms should be implemented expeditiously.
- **Affordability and financing:**
 - Businesses need clear cost visibility, low-cost finance and support schemes that are simple to use.
 - Regulatory certainty arising from prolonged planning and judicial review processes continues to lock private sector investment out of projects by increasing the costs of projects overtime.
 - Expanded SME finance, grants and advisory services should be implemented.
- **Shortages in green skills:** retrofitting, engineering, grid delivery, and industrial decarbonisation are all affected by skills shortages. Greater investment in education, apprenticeships, and lifelong learning is required to address these gaps.
- **Community acceptance:** Public engagement should happen early regarding projects with a focus on explaining benefits clearly and responding to legitimate concerns. The most pertinent examples manifest in renewable energy projects in communities or where public transport projects are planned.

The principles of a Just Transition (evidence-base and structured; skills and opportunity; fair sharing of costs; social dialogue and lived experience) are explained by the Just Transition Commission. What are your views on how these principles can be incorporated into the next CAP or climate action more generally?

The Just Transition should be embedded across every sectoral chapter instead of being siloed. For businesses, affordability should be central to any policy design and obligations being imposed on them should be proportionate and consistent with the “Think Small First” principle. SMEs especially often have fewer financial, technical and administrative resources than larger firms, yet

they are increasingly affected by energy costs and reporting obligations which impact these resources which carry both a financial and administrative cost.

In addition, there is an opportunity for the Plan to utilise pre-existing structures already in place. Many of our members participate in established local partnerships with local authorities and other stakeholders that support effective engagement and delivery. The next Climate Action Plan should place greater emphasis on leveraging and scaling these existing networks to accelerate the implementation of climate measures at local level.

While some of the below recommendations are already detailed in our submission, the next Plan should incorporate Just Transition principles through:

- **Affordability tests:** major measures should be assessed for their impact on SMEs and exposed sectors before implementation.
- **Access to finance:** grants, tax measures, low-cost loans and advisory supports should be easier to access and designed for staged investment. Ensuring they are accessible for businesses of all sizes will be key to uptake. Smaller businesses in particular need one-stop advisory services along with practical tools to measure emissions and identify cost-saving investments.
- **Skills and opportunity:** training and apprenticeships should be aligned with renewables, grid, engineering, construction, digital systems, circular economy and biodiversity needs.
- **Social dialogue:** businesses, communities, and local authorities should be engaged early, particularly where measures affect costs, mobility or land use.
- **Technology neutrality:** different sectors and sites require different pathways, especially in heat, freight and industry. A broader set of practical options can reduce cost and increase participation.

The National Adaptation Framework and the Sectoral Adaptation Plans have been published. To what extent should further climate change adaptation measures be included in the next CAP?

A secure and flexible energy system should support renewable deployment while maintaining continuity during system stress, severe weather and external disruption. As these risks are likely to increase, adaptation must be treated as an integral element of energy security and security of supply.

Stronger adaptation will reduce disruption and improve economic resilience, but the costs imposed on businesses must remain proportionate. Businesses are increasingly investing in flood resilience and other measures to mitigate climate-related risks. These necessary but often overlooked costs reduce competitiveness and constrain investment elsewhere in the business. Adaptation should therefore be treated as a competitiveness priority as well as a climate measure.

Accordingly, there should be greater public investment in infrastructure that is required to safeguard our urban areas from further such climate events and this should be accompanied by support schemes for businesses to invest in adaptation measures. In addition, the National Training Fund should be used to invest in skills development in sustainable practices.

The next Plan should embed adaptation in each sectoral chapter. Priority should be given to:

- **Flood risk management:** public flood defences, surface water management, drainage, coastal protection and property-level resilience should be accelerated.
- **Business continuity:** SMEs should have access to practical climate risk tools covering flooding, heat, power outages, supply-chain disruption, insurance and continuity planning.
- **Green Skills:** Utilise the National Training Fund for funding skills development in sustainable practices.
- **Adaptation in buildings:** retrofits and new-build standards should address overheating, flood resilience (where relevant and appropriate), ventilation, water efficiency and backup power.

- **Nature-based solutions:** wetlands, tree planting, sustainable drainage, river restoration and green infrastructure should be integrated into public realm, housing and infrastructure projects.