



Annual Review 2023

Recommendations and Commentary

October 2024

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Abbreviations

AFIR	Alternative Fuels Infrastructure Regulation
CAP	Common Agricultural Policy
CAP24	Climate Action Plan 2024
CAP23	Climate Action Plan 2023
CCAC	Climate Change Advisory Council
CCAC AR23	Climate Change Advisory Council Annual Review 2023
CEG	community energy grant
CIS	Construction Information Services
CRU	Commission for Regulation of Utilities
CSO	Central Statistics Office
DAFM	Department of Agriculture, Food and the Marine
DECC	Department of the Environment, Climate and Communications
DETE	Department of Enterprise, Trade and Employment
DHLGH	Department of Housing, Local Government and Heritage
DPENDR	The Department of Public Expenditure, NDP Delivery & Reform
DMURS	Design manual for urban roads and streets
EPA	Environmental Protection Agency
ESAB	European Scientific Advisory Board
JOC	Joint Oireachtas Committee
KPI	Key Performance Indicators
LA CAP	local authority climate action plan
LULUCF	Land Use, Land Use Change and Forestry
MACC	marginal abatement cost curve
MMC	modern methods of construction
NAF	National Adaptation Framework
NBAP	4 th National Biodiversity Action Plan
NBS	nature-based solutions

NEDS	National Energy Demand Strategy
NPF	National Planning Framework
NTA	National Transport Authority
RESS	Renewable Electricity Support Scheme
RRDF	rural regeneration and development fund
SAF	sustainable aviation fuels
SAPs	sectoral adaptation plans
SEA/AA	strategic environmental assessment and appropriate assessment
URDF	urban regeneration and development fund
WEI	Wind Energy Ireland

Key Recommendation (Annual Review 2023)

Commentary (September 2024)¹

Adaptation Progress in Ireland

3.1 Previous Council recommendations remain critical, namely that an adaptation budget is set for 2030 and an assessment of what is required to make Ireland resilient by 2050 and beyond is undertaken, based on agreed consistent criteria. Specific funding for adaptation is needed from relevant departments, regulators and local authorities. Investment from the private sector is essential to leverage the level of public finance currently available for adaptation.

The National Development Plan outlines the allocations for capital investment for the period to 2030, and it is for individual Departments, including those with sectoral responsibility for emissions ceilings, to decide on the most appropriate prioritisation and application of the funding allocated to them. Current expenditure ceilings for climate action, as for all spending priorities, are decided as part of the annual estimates process.

While there is no specific adaptation budget set for 2030, the Department of Public Expenditure, NDP Delivery and Reform (DPENDR) has published a report that tracks and reports on climate-related expenditure in the Revised Estimates for the Public Service (REV) since 2019. The Department has revised their approach for the Revised Estimates for the Public Service 2024 and has started implementing a work programme over the coming years targeting several improvements and methodological changes in each iteration, including the consideration of 6 climate and environmental criteria (mitigation, adaptation, pollution, water quality, circular economy, biodiversity) in line with the EU Taxonomy

¹ Relevant Departments were provided with an opportunity to provide updates on the information contained in this commentary which have been addressed.

	<p>for Sustainable Activities. The report estimates adaptation favourable expenditure of €2.6 billion in 2024, with no unfavourable expenditure identified. A workshop was held in July 2024 to improve the methodology for the assessment of favourable and unfavourable adaptation expenditure.</p>
<p>3.2 Erosion, sea level rise and coastal storm events are being magnified by the changing climate. A clear and fit-for-purpose Coastal Management Strategy is urgently needed to help actively manage our changing coastlines and to support communities, businesses and households most at risk to build resilience.</p>	<p>The Scoping Report for a Coastal Management Strategy was published on October 26th, 2023. This provides useful recommendations developed by the Inter Departmental Group on National Coastal Change Management Strategy, including key elements of what an Irish Coastal Management Strategy should include. However, no date for publication of the long-awaited strategy has been provided in the report or in the Climate Action Plan 2024 (CAP24).</p>
<p>3.3 To measure the mainstreaming and impact of adaptation actions, it is recommended that a set of national adaptation indicators be established over the coming 12 months. The use of measurable key performance indicators and timelines should also be strengthened in the next set of guidelines for sectoral adaptation plans, and the implementation of these plans should be monitored and evaluated regularly.</p>	<p>In March 2024, the Adaptation Committee of the Climate Change Advisory Council held its annual workshop on adaptation indicators to assist sectors with the development of adaptation indicators for their SAPs.</p> <p>In July 2024, a set of adaptation indicators was developed and published for Transport Infrastructure Ireland as part of a project with the Environmental Protection Agency (EPA). The indicators are a reference point for other sectors to consider when designing their sectoral adaptation plans (SAPs).</p> <p>A monitoring and reporting system has been developed to track progress against the key performance indicators (KPIs) set out in the Climate Action Plans, although these are high level only as relates to adaptation. Starting in 2024, the</p>

	<p>Department of the Environment, Climate and Communications (DECC) will publish an annual KPI report, complementing the quarterly reporting by the Department of An Taoiseach, and the periodic reporting by the EPA and the Climate Change Advisory Council (CCAC).</p>
<p>3.4 It is essential that the Department of the Environment, Climate and Communications ensures policy coherence between the new National Adaptation Framework, the next iteration of sectoral adaptation plans and the local authority climate action plans that are currently under development</p>	<p>Steps are being taken by DECC to ensure consultation between the sectors and local authorities during the development of the SAPs. This was discussed at the National Adaptation Steering Committee on 22 February 2024. One proposal is to bring forward the review of the new National Adaptation Framework (NAF) before its next iteration to better sequence the NAF, SAPs and local authority climate action plans (LA CAP) in future, but no decision has been taken to date.</p>
<p>3.5 There is a greater need for a mixture of top-down and bottom-up approaches and to engage communities, non-governmental organisations and the private sector in adaptation planning and implementation. This should be promoted through the new National Adaptation Framework, the next iteration of sectoral adaptation plans and the local authority climate action plans.</p>	<p>The LA CAP guidelines required each local authority to plan and make appropriate provisions for stakeholder engagement, including communities, when developing their plan. Stakeholder engagement refers to all of the various methods used to involve interested parties, including participation, consultation, discussion, dialogue, briefings, information dissemination, interaction and co-operation. The Climate Action Plan 2023 (CAP23) AD/23/20 requires sectors, environmental non-governmental organisations and the general public, via statutory consultation, to provide input to the development of the National Adaptation Framework.</p>

	23 submissions were made during the public consultation process. Sectoral adaptation plans are also subject to a public consultation process.
3.6 The importance of an all-island approach to climate action is well documented and should be developed further, especially in relation to critical infrastructure and the management of cross-border natural systems.	Work is being carried out by the British Irish Council, the All-Island Climate and Biodiversity Research Network, the Shared Island Initiative and other groups. However, there is significant scope for further work in this space.
Mitigation – National and International Contexts	
4.1 The unallocated emissions reductions set out in National Climate Action Plan (NCAP) 2023, and the delay in setting a sectoral emissions ceiling for the LULUCF sector, continue to create uncertainty. Increased ambition within and across sectors is necessary to achieve the overall objectives.	CAP24 has articulated a revised approach to Land Use, Land Use Change and Forestry (LULUCF) with respect to carbon budgets and sectoral emissions/removals. Alignment with EU targets has been given priority. CAP24 also included the announcement of a number of new taskforces to look at issues arising in respect of the unallocated savings. The commitment to finalising the terms of reference for all of these groups by the end of Q2 2024 has not been achieved according to the most recent quarterly reporting on CAP24.
4.2 Government must redouble efforts to accelerate the deployment and prioritisation of key mitigation measures across departments and their agencies to make up lost ground.	There is limited evidence of an acceleration of the deployment of key mitigation measures. There was encouraging reductions in emissions across many but not all sectors in 2023 but it remains to be seen if these can be maintained and accelerated to the degree required to demonstrate compliance with CBs/SECs

4.3 The Council strongly recommends that urgent action is taken to reform and resource planning, licensing and regulatory systems across all levels of Government to achieve the level of investment, particularly in infrastructure, required to reduce emissions at the pace required by 2030.

As of October 2024, the Planning and Development Bill 2023 had passed the fifth stage in Seanad Éireann (the final stage before being enacted), and the consultation on the first revision to the National Planning Framework (NPF) had closed.

Resourcing remains an issue across the planning system however additional resources have been provided to An Coimisiún Pleanála (when all approved posts are filled approximately 300 people will be employed) and the Marine Area Regulatory Authority to support the new planning regime that has been put in place to accelerate the development of Ireland’s offshore wind industry.

Budget 2025 includes €287 million for DHLGH’s planning programme (€71m relating to current services and €216m for capital expenditure). This will include investment in the resourcing of the planning system, including to maintain sanctioned staffing levels for An Bord Pleanála, and the Office of the Planning Regulator and staffing levels for local authorities and training programmes.

4.4 Delays in the implementation of critical actions which make a meaningful contribution to the reduction of emissions in the near term mean that steeper emission reductions will be required in the future in order to remain within the carbon budgets. Government departments need to analyse and communicate the expected annual reductions in

The pathways for achieving sectoral emissions ceilings are still not clearly elaborated by sectors, with unallocated emissions unallocated emissions savings still yet to be allocated to sectors.

emissions in response to implementation of policy. In this way, progress can be monitored, with critical delays and underperformance identified and addressed.

4.5 Government must increase and better coordinate efforts to support all members of society in making the transition through the prioritisation, adequate resourcing and delivery of meaningful dialogue and engagement with civil society to help individual and societal behavioural change

CAP24 proposes a number of measures around citizen engagement, including increasing awareness of climate change based on evidence through a whole of Government communications programme.

In the Progress Report for Q1 and Q2, citizen engagement actions from CAP24 were not reported directly. Instead, a 'cross cutting' section reported some items, while others were addressed in *Section 1.1 Climate change news and activity in Q1 and Q2 2024*

- Climate Conversations 2024 was launched in Q2.
- In Q1, the EPA published the second wave of its 'Climate Change in the Irish Mind' project.
- In September, the Minister announced a campaign called 'Climate Actions Work' which focuses on encouraging and supporting climate engagement and communications actions. A national radio, print and social media campaign will also get underway to amplify climate actions that are already happening and encouraging more people to get involved

Electricity

5.1 The Renewable Electricity Spatial Policy Framework and the revised onshore wind energy development guidelines are crucial and should be published by Q3 2023 at the latest to provide the necessary spatial planning guidance to support the scaled-up deployment of renewable electricity across the country.

The Renewable Electricity Spatial Policy Framework was due to be published by DECC in Q3 2023 (CAP23 EL/23/2). This delayed action has now been superseded by a CAP24 action (EL/24/3) for the revision to the NePF to include regional capacities for the allocation of national targets at a regional level in order to inform local development plan policy. This was due in Q2 2024 with the Department of Housing, Local Government and Heritage (DHLGH) leading. The draft first revision to the NPF was published in July 2024, including regional targets for onshore renewables to be allocated to local authorities.

5.2 An Bord Pleanála, local authorities, the Maritime Area Regulatory Authority, the National Parks & Wildlife Service and other agencies must be sufficiently resourced to process the volume of onshore and offshore planning applications and associated grid infrastructure in line with the statutory timeframes for planning decisions.

By Sep 2024 for Local Authority planning decisions, there are approximately 14 wind farm developments awaiting decision, with a capacity ~950 MW. Four have received planning permission (250 MW), and 7 were refused (400 MW). Many of those refused permission are currently under appeal.

29 solar farms are awaiting decision on planning, with a capacity >570 MW. 27 solar farms have been granted planning in 2024, with a capacity >515 MW and two farms were refused permission (>40 MW), with many under appeal. Projects appear to be progressing through the system at pace, however, the volume and capacity of projects has not yet reached the level required to meet targets.

	<p>DECC noted in their response to the Joint Oireachtas Committee (JOC) on the CCAC Annual Review 2023 (CCAC AR23) that a comprehensive strategy to increase staffing resources in local authority planning departments is being developed by DHLGH. Staffing capacity is increasing in relevant agencies, with improvement in decision-making timelines. By the end of June 2024, An Bord Pleanála has only approved 4 projects (228 MW), with 8 projects (459 MW) rejected. Projects totalling 1.8GW are still in the planning process.</p>
<p>5.3 A streamlined and swift permit assessment process for lifetime extension and repowering of existing onshore renewables in line with RePowerEU timelines must be implemented to guard against a significant loss of existing onshore capacity.</p>	<p>Although it is difficult to track repowering and lifetime extensions of renewables, according to the Construction Information Services (CIS) database, two wind farms in Sligo and Donegal (32 MW) were granted an extension to the lifespan of operation and one was refused (6 MW).</p> <p>A Wind Energy Ireland (WEI) commissioned report has identified approximately 850 MW of capacity to be decommissioned by 2030, and 2500 MW by 2040, unless repowered or extended. Currently, 26% of operational windfarms are located in areas where wind energy development is not favoured, with only 65% located in favoured areas.</p>

<p>5.4 Action to facilitate hybrid technology grid connections and ‘private wire’ networks has been delayed and must be prioritised and delivered by Q4 2023</p>	<p>DECC launched a consultation on private wires on 18 August 2023 with the closing date for submissions extended to 27 October. Facilitation of hybrid connections, policy on private wires and publication of the revised wind energy guidelines have been identified as critical actions yet again in CAP24. However, these actions have all been delayed and carried over from the 2019, 2021, 2023 Climate Action Plans. All are now due in Q4 2024.</p> <p>In July 2024 the Private Wires Guiding Principles for Policy Formulation and the results of 2023 Public Consultation were published. To date there is no update on facilitation of hybrid connections.</p>
<p>5.5 The failure to deliver the necessary generation capacity in the context of a forecast increase in electricity demand has undermined previous commitments to close the Moneypoint coal-fired generation plant in 2025. It is critical to phase out the use of coal in electricity generation in the near term and focus on the necessary revision of the capacity market to ensure that 2GW of new flexible gas-fired generation (which is green hydrogen ready) is delivered on time.</p>	<p>A decision has been taken to retain Moneypoint as an out of market generator of last resort from 2023 until 2029 (while changing from coal to oil use) for security of supply. Previous Renewable Electricity Support Scheme (RESS) auctions have been slow to deliver the necessary new generation capacity, however, the RESS4 auction was positive, with 374 MW wind and 960 MW solar projects provisionally successful.</p>
<p>5.6 The Commission for Regulation of Utilities (CRU) review of the regulatory treatment of storage, due later this year and including licensing and market incentives, is crucial for increasing the flexibility of Ireland’s electricity system and</p>	<p>The DECC consultation on developing an Electricity Storage Policy Framework for Ireland closed on 27 January 2023 and the summary of consultation responses was published on 25 May 2023. The Framework was due for publication in Q3</p>

<p>must be delivered on time. Further policies are essential to incentivise short- and long-duration storage to balance and optimise electricity demand and variable renewable generation.</p>	<p>2023, however, was only published in Q4 2023. This will likely have a knock-on delay to the publication of the CRU review of the regulatory treatment of storage due in 2023, which is still not published.</p> <p>DECC noted in their response to the JOC on the CCAC AR23 that 'there will be required long term storage facilities in place by 2025'.</p>
<p>5.7 The Council regrets the delay in publication of the Electricity Demand Side Strategy, which was originally due in 2022, and urges that it is available not later than Q4 2023. This strategy is fundamental to achieving Ireland's electricity sector decarbonisation targets and the Council calls on the multiple Government departments and agencies involved in collaboration with industry to swiftly and efficiently implement the strategy.</p>	<p>There is significant improvement in terms of actions to deliver demand management in CAP24, despite the delay to the publication of the long-awaited National Energy Demand Strategy (NEDS) which was finally published in July 2024.</p> <p>New actions include:</p> <ul style="list-style-type: none"> • a decision on dynamic green electricity tariffs originally due Q2 2024 (EL/24/21) was published by CRU in September 2024 • implementation of enhanced emissions reporting framework for electricity emissions for large energy users and the system operators dispatch actions due Q4 2024 (EL/24/22), • incentivise and enable large energy users to participate in flexible demand initiatives designed to enable low / zero carbon demand growth (EL/24/23), • develop a methodology to incentivise and enable industrial heating facilities to participate in flexible demand initiatives (EL/24/25),

	<ul style="list-style-type: none"> • identify smart energy pilot schemes and skills training options to assess potential for smart energy and technology integration solutions in homes/communities (EL/24/27).
<p>5.8 Targets for 20–30% demand side flexibility, particularly for large energy users such as data centres, should be based primarily on shifting demand to times when the output of renewable energy from the system is high and avoid the use of on-site high-emission generation.</p>	<p>NEDS identifies Area 2 (Demand Flexibility and Response) as the major contributor for demand flexibility growth in the period 2024-2026, achieved through flexibility procurement exercises initiated by system operators.</p>
<p>5.9 A clearer legislative basis to support the widest possible access to smart metering data needs to be progressed as a matter of urgency to address a significant barrier to the uptake of time-of-use tariffs.</p>	<p>CRU published an information paper on the Smart Meter Access Code in late 2023 with a decision on this due in Q2 2024. CRU have facilitated stakeholder workshops in the interim and a proposed decision smart meter data access code was published in August 2024. A final decision on the smart meter data access code was due to be published in Q3 2024 (action number 1.18 in NEDS).</p>
<p>5.10 A review of the effectiveness of initiatives such as the ‘Beat-the-Peak’ pilot schemes and the ‘Reduce Your Use’ campaign should be conducted.</p>	<p>CAP24 notes the need to ‘empower business and households by developing clear public information regarding electricity carbon intensity in real time and promote opportunities to shift demand to times of low carbon intensity’. The Council welcomes the new action (EL/24/29) to ‘establish a national programme of consumer communications, educational and behavioural initiatives based on research relevant to demand side flexibility’. There is no specific mention of review of effectiveness, but CAP24 notes almost 9 in 10 people are already taking steps to reduce energy use, with 59% people</p>

	<p>having reduced the amount of energy used at peak time, and 23% planning to do so.</p> <p>A "Reduce your Use" campaign for the public sector is being conducted.</p> <p>Action 1.6 in NEDS, due in Q1 2025, is to develop, agree and publish a plan for customer engagement in demand flexibility initiatives. Review of effectiveness is not explicitly mentioned.</p>
<h2>Transport</h2>	
<p>6.1 Ireland's transport system needs to make accessible, sustainable transport modes more attractive and shift away from car dependency through consideration of the proximity between people and places in land use and housing planning.</p>	<p>The NPF is currently undergoing a review and a public consultation closed on 12 September 2024. The draft for consultation includes significant updates to incorporate transport-oriented development and sustainable transport.</p> <p>The National Sustainable Mobility Policy's Principle 3: Better Integrated Mobility has a goal to better integrate land use and transport planning at all levels and the new Moving Together strategy, which is currently being finalised, commits to developing enhanced implementation mechanisms to support the phased alignment of large-scale urban development to major public transport investment.</p> <p>The Section 28 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities</p>

	<p>were published in January 2024 and state that one of the considerations local authorities must take into account in the preparation of development plans or assessing individual building projects is proximity and accessibility to services and public transport.</p>
<p>6.2 The compact growth target in the current National Planning Framework is insufficiently ambitious to achieve the low carbon transition in the transport sector. The review of the National Planning Framework needs to reassess how Ireland approaches compact growth (housing density) and how it is measured from a spatial perspective.</p>	<p>The NPF is currently undergoing a review and a public consultation closed on 12 September 2024. The draft for consultation does not propose any change to overall compact growth targets. It proposes a new approach to monitoring urban growth based on the built-up footprint of existing settlements as defined by the Central Statistics Office (CSO) and proposed amendments to national policy objective 101 provide for the development of new approaches to measure and monitor the development of brownfield and infill lands and the achievement of compact growth.</p>
<p>6.3 Poor economic incentives for urban brownfield/infill development need to be addressed in order to limit further urban sprawl, along with the development of improved incentives for urban living and the revitalisation of vacant urban buildings.</p>	<p>Funding measures such as the Urban Regeneration and Development Fund (URDF), Rural Regeneration and Development Fund (RRDF), Croí Cónaithe Towns and Cities Schemes and Vacant Property Refurbishment Grant are ongoing, and this is an area that is considered under the review of the NPF.</p> <p>Budget 2025 has increased the Vacant Homes Tax and the Residential Land Zoned Tax is due to be implemented in 2025.</p>

6.4 Urgent investment is needed to improve the accessibility and reliability of public transport services in addition to road space reallocation, along with a fully interactive app with improved data on bus reliability and capacity. The ongoing programme of Public Service Obligation bus fleet replacement and depot charging upgrades should be expanded and accelerated with a focus on the electrification of public transport to support air quality goals.

Budget 2024 included approximately €220 million for bus projects and €200 million for rail across the country. Budget 2025 allocates a total of €1.6 billion for public transport roll- out.

A recent National Transport Authority (NTA) report reviewing the implementation of the connecting Ireland programme, which aims to implement an enhanced rural transport system, noted the introduction of 65 new and enhanced bus services connecting 190 new towns and villages under phase 2 in 2023.

In the Dublin metropolitan area, there are 92 zero emission buses in service and 34 zero emission buses in service in the Limerick metropolitan area. Athlone became the first all-electric town bus service in 2023 with the arrival of 11 new single-deck battery-electric buses

Action 8 of the Sustainable Mobility Policy aims to deliver charging infrastructure for the operation of a zero emission public bus fleet by Q4 2025. The year 2 progress report states that this action is on schedule with depot electrification complete in Athlone and Summerhill in Dublin (with Phibsborough depot electrification works ongoing) and in Limerick.

6.5 The Council recommends that choices need to be made now on the design and implementation of demand

A draft strategy for transport was published in April 2024 (Moving Together: A Strategic Approach to Improving the

management measures through the development of the National Demand Management Strategy. This should use proven approaches to drive behavioural change such as road pricing (e.g. congestion charging, low-emission zones), parking restraints and fuel pricing. The Tax saver commuter ticket scheme and the cycle to work scheme should be updated, alongside the implementation of Part 18B of the Finance Act (No. 2) of 2008 (Parking Levy in Urban Areas) in the major urban centres of Cork, Dublin, Galway, Limerick and Waterford.

Efficiency of Ireland's Transport System) along with an implementation plan. These were open for public consultation until 21 August 2024 with a strategic environmental assessment and appropriate assessment (SEA/AA) screening process also being undertaken. The latest Climate Action Plan progress report notes that the strategy will be resubmitted to Government for approval and final publication in Q4 2024.

As well as a range of recommendations related to parking within the strategy, there is a commitment to examine options for disincentivising workplace parking, building on the review of Part 18B of the Finance Act which is also considered in the tax strategy group papers for Budget 2025.

CAP24 notes 'this process does not prevent various demand management measures from progressing, including road space reallocation and parking related measures for example.' It also notes; 'Road space reallocation and a sustainable approach to parking policy are considered to form key measures to both reduce unsustainable private car demand and enhance placemaking, supporting improvements in the accessibility and air quality of our urban spaces. For local authorities, these are areas in which they have the capacity to directly influence in the short to medium term, and which are strongly recommended for consideration in the development of their 5-year local authority climate action plans.'

6.6 The current reduction in school transport scheme fees and in public transport fares should be continued in Budget 2024. Access to school buses under the scheme should be significantly expanded. The Council recommends an assessment of the impact to date of the reduction in public transport fares on emission reduction as an input to longer term fare strategy development.

Budget 2024 extended the reduction in public transport fares and the impact of new fare initiative was assessed in a report published in December 2023. A new fares strategy was also published by the National Transport Authority (NTA) in January 2024.

The review of the School Transport Scheme was published on 27 February 2024. It states that 161,000 pupils currently travel to school using the School Transport Scheme and has recommended expanding access to the scheme so that an additional 100,000 pupils can be carried by 2030. Charges for the School Transport Scheme will remain at the same reduced rates for the upcoming 2024/2025 school year. The review assessed how the School Transport Scheme can continue to work in liaison with the Safe Routes to Schools Programme. Budget 2025 includes funding for expansion of Safe Routes to Schools projects to Round 3 schools, extension of free child fares on PSO services and continued Young Adult/Student Leap Cards.

6.7 Local Authority Climate Action Plan Guidelines should include specific actions and indicators in respect of accessibility, modal shift and active travel. The local authority of each city should introduce park and ride schemes along major arterial roads (by 1 January 2030), as well as produce (by 1 January 2025) and deliver (by 1 January 2030) a plan to reduce the number of public city centre parking spaces.

According to the Sustainable Mobility Policy year two progress report, implementation of the Greater Dublin Area Park and Ride Strategy has commenced with planning applications in development for 3 sites.

All of the local authority climate action plans have been adopted to date and launched by the Minister on 11 April. An exercise has been carried out by the CAROs to review

	<p>LACAPs and categorise actions which has identified 78 active & sustainable travel actions within decarbonisation zones and 177 transport actions. A further review of overall LACAPs would be useful to assess wider actions across each local authority.</p> <p>The sustainable and compact settlement guidelines, published in January 2024, supplement policy on reducing and minimising car parking spaces.</p>
<p>6.8 Motor Tax should be recalibrated to promote resource and energy efficient vehicles and should escalate year by year. Vehicle Registration Tax percentage rates for all category A vehicles (EU category M1) bands, except the least-polluting band, should also increase.</p>	<p>An action in CAP24 aims to further explore policy options in this area for environment related taxation reform. Motor taxation rates and VRT for private motor cars have not increased in Budget 2025.</p> <p>A review of taxation in the Transport sector is considered in the draft Moving Together Strategy and the Budget 2025 tax strategy group papers outline potential future areas of change to vehicle registration tax and motor taxation.</p> <p>Some VRT changes along with other measures have been introduced in Budget 2025 to support commercial electric vehicles. These measures include;</p> <ul style="list-style-type: none"> • BIK relief on battery electric company vehicles which sees extension of the temporary universal relief of €10,000 to the Original Market Value (OMV).

	<ul style="list-style-type: none"> • BIK relief on the installation cost of an electric vehicle charger at an employee's home address (for a vehicle used for work purposes). • VRT amendment so that battery electric commercial vehicles (such as those used for the carriage of goods) can now qualify for the €200 VRT rate. • Introduction of an emissions-based approach to VRT for Category B Commercial Vehicles. Vehicles with CO₂ emissions of less than 120g/km will receive a lower 8% rate of VRT to encourage the purchase of lower emitting vehicles.
<p>6.9 Electric vehicles present a means of achieving significant reductions in emissions, particularly in rural areas, and improvements in the charging infrastructure and incentives for uptake are important measures in the short term. A policy for the roll-out of vehicle-to-grid-enabled electric vehicles with bidirectional home charging should also be urgently prepared.</p>	<p>An 'issues paper' for the forthcoming draft National Policy Framework on Alternative Fuels (Ireland's framework for the longer-term national vision for decarbonising transport by 2050 under the Alternative Fuels Infrastructure Regulation (AFIR)) was published for public consultation until 14 June 2024 and included reference to bidirectional recharging points.</p> <p>CAP24 RE/24/22 aims to progress enabling and grid connection works to support achievement of AFIR requirements, including en route, high powered charging on motorways and the national road network, a national destination and neighbourhood EV charging plan and local authority EV network plans.</p>

<p>6.10 It is recommended that the target for commercial electric vehicles should be increased to 150,000 by 2030 from the current target of 95,000 to support decarbonisation of commercial vehicle activity, with consideration of additional incentives to support adoption by businesses.</p>	<p>There was no change in CAP24 but the fleet model is due to be updated with potential adjustments to CAP targets for the fleet to be considered following this.</p>
<p>6.11 The Council welcomes work carried out in the last year to assess the challenges associated with biofuel blending and recommends continued assessment and transparent reporting in this area.</p>	<p>CAP24 notes that the Renewable Fuels for Transport Policy Statement includes establishment of working groups concerning national CAP biofuel targets and achieving EU requirements, i.e., ensuring greater supply of advanced biofuels in transport energy consumption and concerning the sustainability of biofuel supply.</p>
<p>6.12 A national certification/accreditation system for eco-driving programmes as identified in the Road Haulage Strategy (December 2022) should be established immediately along with a policy for the development of freight consolidation centres. A step up in ambition is also required on the future role of Ireland's rail network in order to significantly increase the proportion of inland freight tonnage moved by rail.</p>	<p>CAP2024 notes 'In line with the objectives of CCAC recommendation 6.12 in relation to establishing a certification / accreditation system for eco-driving, the Department of Transport is currently working towards establishing such a standard for eco-driving courses and will, in addition, analyse what incentives and measures could be introduced to increase the number of drivers undertaking available courses.'</p> <p>Within the Road Haulage Strategy Annual Progress Report published in January 2024, it states "Following discussion and consultation with stakeholders at the Road Freight Forum, the requirements for the project to establish a national certification system for eco-driving courses were agreed. This project will also look at measures and incentives</p>

	<p>to improve the uptake of Eco-Driving courses and will assess international best practice."</p> <p>At the end of Q3 2024 the Department established a national standard for Eco-driving courses. Work will commence shortly to evaluate existing courses against the standard and to assess potential measures and incentives available to increase uptake and maintenance over time of eco-driving techniques.</p> <p>The final report of the All-Island Strategic Rail Review was published at the end of July 2024, which sets out a strategic vision for the development of the rail system across the island of Ireland up to 2050, aligning with commitments in both Ireland and Northern Ireland. The review includes recommendations to enable an increase in rail freight's market share. The Review recommends actions including the reduction in track access charges for freight services and strengthening rail connectivity with ports.</p>
<p>6.13 Ireland needs to develop a strategy for increasing the share of sustainably sourced aviation fuels.</p>	<p>A Sustainable Aviation Fuels (SAF) Task Force was established (as per CAP24) to bring together stakeholders to contribute to the development of a national SAF Roadmap. To date, the Task Force has held four meetings, with another expected to take place in Q4 of 2024.</p>

	<p>The Department of Transport is currently drafting the Roadmap, which is targeted for completion by the end of 2024</p>
<p>Built Environment</p>	
<p>7.1 Clear policy choices need to be made about the long-term roll-out of low-carbon heat sources in Ireland’s existing buildings and the interaction between support for district heating and deep retrofits to support heat pump installation. Introducing evidence-based zoning for district heating at the local authority level and comprehensive characterisation of heat sources is crucial to progression. It is essential that further research and consolidation of information on the age of dwellings, location and specific heating systems across dwelling types is undertaken to support urgent delivery of this ambition.</p>	<p>A national heat policy statement has not yet been published (originally due in Q3 2023) because of a requirement for an SEA/AA to be completed. Once this is complete it will go to public consultation.</p> <p>CAP24 includes an action to draft the General Scheme of a Heat Bill to establish a regulatory model for district heating that ensures consumer protection and the delivery of a vibrant district heating industry, and to mandate all public sector buildings and facilities to connect to district heating where available and technically and economically feasible. According to the CAP24 Q1 & Q2 progress report, the completion of the General Scheme of a Heat Bill is expected in Q3 2024.</p>

<p>7.2 The Council recommends that best practice examples from other jurisdictions are followed in terms of the roll-out, governance framework and management of district heating networks, with clear enabling legislation required urgently in this area.</p>	<p>See Recommendation 7.1.</p>
<p>7.3 Large energy users, and data centres in particular, should be obliged to build in a heat export ability at the time of construction to allow simple connection to future district heating networks. Existing data centres should progressively retrofit these.</p>	<p>A similar recommendation was included in the report of the district heating steering group. CAP24 states that these actions are underway, specifically that industrial facilities supply waste heat to district heating where the total rated energy input is at least 1 MW.</p> <p>The European Commission adopted guidance to EU countries in September 2024 under the Energy Efficiency Directive on how to ensure the efficient use of excess heat available from large energy consuming facilities, such as industries and data centres.</p>
<p>7.4 Budget 2024 should set a target of 100% of social housing being raised to a building energy rating (BER) of B2 or connected to a district heating network by 2030, with retrofit measures prioritised in areas where it is unlikely that district heating networks can provide a solution. This should be supported by utilisation of local authority and Census 2022 data to assist local authorities in configuring their local authority climate action plans (LACAPs) for residential heat.</p>	<p>CAP24 aims to increase the number of social housing retrofits carried out in 2024 but maintains the overall target of 36,500 by 2030. Over 2,400 social housing retrofits were completed in 2023 by local authorities. Budget 2025 includes funding of €90 million to support retrofitting of circa 2,500 social homes to a Building Energy Rating of B2 or cost optimal equivalent.</p>

	<p>Budget 2024 included an increased budget allocation for the SEAI Warmer Homes Scheme with an increase to €240 million in Budget 2025. According to SEAI's retrofit progress report for 2023, SEAI completed ~5,900 upgrades (+33% since 2022) for homeowners under the Warmer Homes Scheme (fully funded energy upgrades) in 2023. There were considerably more (+41% since 2022) applications due to increased awareness of the scheme but also broadened eligibility criteria.</p>
<p>7.5 Significant acceleration is required to the rate of retrofit in Ireland. Properties that primarily use peat and/or coal as their heating fuels, particularly in open fireplaces, should be specifically targeted for grants for retrofitting and connection to low-carbon heating systems within the next 2 years.</p>	<p>Targeting of properties using peat and/or coal is not specifically accounted for in CAP24 although SEAI quarterly retrofitting programme reports demonstrate a significant increase in the delivery of retrofits.</p> <p>Budget 2025 increases funding for SEAI residential and community energy upgrades to €469 million.</p>

<p>7.6 The Council recommends developing a register of interested homeowners via local authorities to facilitate bulk discount retrofits among residents and collective purchase schemes. Consideration should be given to expanding the pilot under way in Fingal County to other local authorities to carry out aggregate retrofit projects in housing estates with a mix of social and private housing to achieve efficiencies of scale and attractive schemes for contractors.</p>	<p>While there is no indication that a register of this type has been developed, the community energy grant (CEG) provided by SEAI supports these types of initiatives. The SEAI provide a list of project coordinators who are necessary to lead on these projects.</p> <p>In 2023, the CEG scheme delivered 601 home energy upgrades and 290 non-residential projects.</p>
<p>7.7 Green financing solutions to assist homeowners and businesses to access longer term low cost rates are essential to address some of the barriers to decarbonisation in this sector. While low-cost personal loans supported by national and EU risk sharing mechanisms are to be welcomed, mortgage providers should be encouraged to provide finance solutions for retrofits based on green mortgage structure and pricing to improve long-term affordability and encourage broader uptake of retrofitting initiatives.</p>	<p>The Government and European Investment Bank's low-cost Home Energy Upgrade Loan Scheme has been launched. Homeowners can borrow €5,000-€75,000 for a term of up to 10 years at low interest rates. Loans, available up to 31 December 2026, are for energy efficiency improvements and can be used in conjunction with SEAI home upgrade grants. From September 2024, the scheme is available through 3 finance providers.</p> <p>The Growth and Sustainability Loan scheme is available through the Strategic Banking Corporation of Ireland for eligible businesses to invest in climate action and environmental sustainability. SMEs can apply for low-cost loans of between €25,000 and €3 million in the scheme's first phase.</p>

7.8 It is recommended that climate maps and data which take account of current and projected climate factors are reflected in future building regulations to enhance resilience in support of adaptation to climate change.

Research with Met Éireann was commissioned by DHLGH to inform the development of policy in relation to building standards.

The weather data developed during this research is being used by industry in assessing overheating risk for new buildings, using the methodology already included in Technical Guidance Document L (the accompaniment to the building regulations) for both dwellings and buildings other than dwellings. The work is also being used to revise Irish Standards approved for use in different exposure zones around the country.

Met Éireann has published the results of this joint research on their website.

Enterprise and Waste

8.1 The preparation of a decarbonisation roadmap for industrial heat based on the recommendations of the Sustainable Energy Authority of Ireland (SEAI) National Heat Study must be delivered by Q4 2023 and provide clear signals for the industry to identify appropriate locations for an intensified roll-out of industrial-scale heat pumps for medium-temperature heating, along with examining links to biomethane to achieve total decarbonisation.

In their letter of response to the JOC regarding the 2023 CCAC Annual Review, the Department of Enterprise, Trade and Employment (DETE) had noted publication of the decarbonisation roadmap in Q4 2023. However, publication was delayed to June 2024. The Roadmap for Decarbonisation of Industrial Heat sets out measures to facilitate electrification and use of biomass to decarbonise industrial manufacturing applications. The Roadmap was

	<p>published alongside an announcement of ring-fenced funding to support capital projects through state agencies.</p> <p>Biomethane is addressed in the roadmap through the implementation of the National Biomethane Strategy. The National Biomethane Strategy is agnostic as to the applications of biomethane, however, it is likely that in the medium and long term the most cost effective use is displacement of natural gas in high temperature applications, and some transport applications.</p>
<p>8.2 Given the high costs of energy it is essential that there is a greater emphasis on energy efficiency for small and medium-sized enterprises in the National Climate Action Plan (NCAP) 2024, to be assisted by knowledge sharing, research and supports from Department of Enterprise, Trade and Employment, SEAI and local enterprise offices and other Government agencies with industrial policy and broader cross-cutting policy mandates.</p>	<p>Actions for large energy users to develop energy efficiency are supported through SEAI's EXEED and SEAI's Large Industry Energy Network.</p> <p>Support for SME Energy Efficiency measures are delivered through and promoted through SEAI and the Local Enterprise Offices</p> <p>Action IN/24/6 will implement best energy efficiency measures from mandatory energy audits. Government will "support" industry-led initiatives such as Business in the Community Ireland. In their letter of response to the JOC regarding the 2023 CCAC Annual Review, DETE noted the Climate Toolkit 4 Business, Green Transition Fund and SEAI supports as key in this regard.</p>

<p>8.3 It is recommended that the action in NCAP 2023 to specify low-carbon construction methods and low-carbon cement material as far as practicable for publicly procured or supported construction projects be made mandatory.</p>	<p>Public bodies are now obligated , under the Public Sector Mandate, to specify low carbon cement and construction materials.</p> <p>A technical report on reducing embodied carbon in cement and concrete through public procurement in Ireland was published in May 2024 by DETE. This was followed by guidance which issued from the Minister for Enterprise to all Government departments and Local Authorities in June 2024 which set out a range of minimum procurement standards in this regard that public bodies are obliged to implement.</p>
<p>8.4 The NCAP 2023 commitment to increase the use of timber in construction to replace cement is welcome. However, the building regulations will need to be updated to support the use of timber in construction, and detailed policies to implement this change along with clear timelines for its delivery are required, for example how the use of timber frames in construction will be realised and its linkage to commercial forestry in Ireland.</p>	<p>CAP24 does not include provision to update building regulations, although this is under consideration through the Timber in Construction Taskforce.</p> <p>It does mention DETE leading a cross-departmental and cross-agency MMC (modern methods of construction) leadership and integration group, including a focus on sustainable construction. A roadmap for increased adoption of MMC in public housing delivery was published in 2023, and the recent clarification that the requirements of the Building Regulations do not prohibit the use of timber products in construction at any height is noted. Alternative approaches to prescriptive guidance are required to achieve compliance under the building regulations but these are not well developed for mass timber above 11m. An interdepartmental</p>

	<p>& industry steering group on timber in construction has been established to increase the use of timber, examine regulatory and standardisation challenges and is due to operate for between 18 and 24 months.</p>
<p>8.5 Greater efforts to reduce the emissions intensity of cement and concrete used in construction are required. The use of innovative lower carbon cements and concretes, for example, by replacing clinker with lower carbon cementitious materials, need to be facilitated in both national and European standards.</p>	<p>Following an action under the Climate Action Plan (CAP) 2021, DETE established and continues to chair the cross-departmental 'Cement and Construction Sector Decarbonisation Working Group' set up in 2022. The members include Department of Housing, Local Government and Heritage (DHLHG), Department of the Environment, Climate and Communications (DECC), Department of Finance, Office of Government Procurement (OGP), Office of Public Works (OPW), Sustainable Energy Authority of Ireland (SEAI), Enterprise Ireland, Department of Taoiseach, the Land Development Agency, Irish Green Building Council, and others. The Working Group agreed that a 'multi-pronged' approach to motivating and facilitating the cement and construction sector to decarbonise is required, including steps to drive wider decarbonisation in the construction sector through a range of means such as:</p> <ul style="list-style-type: none"> ○ more prescriptive public procurement practices, ○ detailed engagement with industry, ○ innovation in the formulation and production of cement and concrete (for example through Construct Innovate), ○ alignment with the Timber in Construction Steering Group,

	<ul style="list-style-type: none"> ○ Modern Methods of Construction (MMC) policy, ○ increased circularity in the construction sector and re-use of cement and concrete products where possible. <p>The Working Group coordinates and aligns this work across Government.</p> <p>A report on reducing embodied carbon in cement and concrete through public procurement in Ireland was published in May 2024 and this was followed up by guidance issued by the Minister for Enterprise to Government departments and Local Authorities in June 2024.</p> <p>There is mention in CAP24 about the need for new regulation and standards to reduce carbon intensity of clinker.</p>
<p>8.6 To achieve targets there is need for increased focus on food waste and food packaging waste segregation in businesses and households, including public education campaigns and economic incentives such as deposit return schemes.</p>	<p>The latest EPA municipal waste characterisation study has highlighted that urgent action is needed to improve Ireland’s municipal waste segregation and recycling performance in order to transition to a circular economy. The deposit return scheme went live in February 2024. As of 13 September 2024, over 500 million drinks containers have been returned since the scheme’s launch. There are now 2,567 active reverse vending machines across the country, up from 1,800 at launch. Sunday 8 September was the busiest day ,with 4.32 million containers returned in one day.</p>

8.7 The Council welcomes the EPA's development of national end-of-waste criteria for recycled aggregates due in September 2023 and is calling on the Department of the Environment, Climate, and Communications to promote markets for the reuse of construction and demolition waste as secondary raw materials in construction engineering processes.

The EPA has published end-of-waste criteria. Focus on the promotion of markets for this material is needed. Publication of the second iteration of the whole –of-Government Circular Economy Strategy is delayed. Publication of secondary legislation for end-of-waste decisions is delayed, and an EPA decision on national by-product criteria in respect of greenfield soil and stone is pending.

Agriculture, Forestry and Other Land Use

9.1 Farmers need to be supported to diversify on-farm activities to reduce emissions and enhance carbon removals. Co-benefits for mitigation, adaptation, water quality and biodiversity should be pursued and impacts monitored. These supports should be provided on the basis of payments for ecosystem services.

There is on-going sectoral and media coverage as various Common Agricultural Policy (CAP) schemes are rolling out. It is challenging to establish the overall reception/acceptance of the measures. However, media reporting on CAP uptake (oversubscribed) suggests strong engagement with reported concerns over timing of payments. The Department publishes the annual performance report for claim year 2023 and the Annual Performance Report Citizens Summary. All elements related to the CSP are published on the Department website at www.gov.ie/cap.

The citizens summary is available here:

www.gov.ie/pdf/?file=https://assets.gov.ie/302160/a929fb5f-18f3-44a1-b7f2-40c45b06a60c.pdf#page=null

More frequent updates on key measures would be useful.

9.2 The recently published marginal abatement cost curve from Teagasc (July 2023) identifies pathways to meet the agricultural sectoral emission ceiling by 2030. Government should ensure a rapid uptake of the proven and effective mitigation measures across the agricultural sector. These include a reduction in the average finishing age of cattle of 3 months; replacing 90% of calcium ammonium nitrate fertiliser and 100% of straight urea with protected urea; the use of feed additives to reduce enteric methane in half of dairy cows and the uptake of diversification options to displace 140,000 livestock units. This will require providing appropriate incentives and support including advisory services, training and resources.

The CAP24 did not increase ambition for most marginal abatement cost curve (MACC) measures. Implementation is largely through knowledge transfer and the knock-on impact of nitrogen management constraints imposed by the revision of the Nitrates Action Programme, which may have an impact on overall chemical nitrogen use. There has also been significant sectoral concern as regards the carrying capacity (stocking rates) the new limits will allow at farm level, i.e. they may drive a reduction in animal numbers on high intensity farms. However, there are numerous approaches to addressing nitrogen limits at farm level, and therefore the constraints may not result in a reduction in livestock. Livestock and dairy output prices appear to have somewhat stabilised, however, tillage is facing a difficult market. Input costs (including fertiliser) have fallen somewhat but remain high and it is unlikely prices will return to pre-crisis input levels in the near term. There is some indication that the profile of the herd (number, age, type) is shifting in response to market and policy signals but there is insufficient data to gauge the full impact at present. Additional communication to stakeholders on fertiliser use and type has been recommended to the Department of Agriculture, Food and the Marine (DAFM) (by Chair in letter).

9.3 The National Biomethane Strategy, due in Q3 2023, combined with the Renewable Heat Obligation Scheme, due in Q4 2023, should clearly set out holistic policies for income diversification opportunities for farmers; the volumes of fossil fuel substitution and emission reductions expected, and the potential for employment in the rural economy.

The Biomethane Strategy was published at the end of May 2024. The industry stakeholders were anxious to hear the starting bell and have clarity on the support structures. Delays are seen to have eroded initial high confidence in the sector. The Strategy explores three scenarios for the roll out of biomethane production capacity and market development, with an apparent preference for mostly larger scale production plants, investor led, enabling a rapid build to full generation capacity by 2030 (5.7 GWh is slightly below the SEAI total national capacity of 6.2 GWh). It is not immediately apparent what the long term vision for the sector might be, as competition with emerging renewable and low carbon energy vectors grows.

Funding of €40 million was secured to further the ambition of the sector through the provision of a capital grant scheme. Letters of offer have started to issue to successful applicants of the scheme reflecting a the high level of interest in the scheme which demonstrates confidence and readiness to invest in the development of this indigenous industry.

DECC in collaboration with DAFM intend to explore options for a second phase of capital support from 2026 to incentivise investment in Anaerobic Digestion, and support wider market development, including agricultural feedstock production at scale.

9.4 Mitigation measures identified in the National Climate Action Plan (NCAP) 2023 for diversification could not be incorporated into the EPA's projections modelling because of a lack of detail in policy design and plans for implementation. Council recommends that the policies and measures are sufficiently detailed to ensure inclusion in subsequent EPA projections scenarios.

There is some progress in the new EPA projections, however gaps remain. Revisions in the provisional inventory methodologies have not yet been implemented in the projections.

9.5 Agriculture is also responsive to market signals. Government should invest strongly in consumer information initiatives, with the support of retail outlets and consumer organisations, to better inform consumer choice in relation to sustainable diets. The initiatives should include cross-sectoral issues of food waste and food packaging. This will provide the necessary market signals to food processors and primary producers to enhance the environmental sustainability of the food system.

No insight on the reaction to this recommendation. Council has made a separate, but related recommendation in its 2024 Annual Review, focusing on getting healthy and sustainable diet information to consumers. While important at consumer level and for public awareness, there is limited confidence that changes in domestic consumption patterns will significantly impact Irish emissions. The European Scientific Advisory Board (ESAB) climate neutrality and 2040 report highlights the mitigation and indirect carbon dioxide removal potential of changes in European diet, and consequent land sparing. If the development pathways envisaged by ESAB are taken, the market for meat and dairy will shift. The Agriculture sector must consider and plan for this.

9.6 The Council recommends that Government fully reflect the agreed EU LULUCF target when establishing the LULUCF sectoral emissions ceiling.

CAP24 has articulated a revised approach to LULUCF with respect to carbon budgets and sectoral emissions/removals. Alignment with EU targets has been given priority. This target is a reduction of 0.626 Mt CO₂ eq, or an approximately 15% decrease. The full ramifications of this approach with respect

	<p>to the “unallocated emissions savings” are yet to be fully explored by Government.</p>
<p>9.7 Afforestation rates remain very low. The Council strongly recommends that Government immediately put in place the necessary resources to streamline and accelerate processes to implement the new Forestry Programme 2023–2027 following State aid approval.</p>	<p>The period January to August 2024 has seen administrative activity back to 2022 levels (slightly ahead). The actual afforestation rate is however well below target, and lower than 2021-2022 rates. Harvest also appears below expectation.</p> <p>The Forest Strategy Consultative Committee has been established and the Communication Plan is being implemented</p>
<p>9.8 Improved understanding of the impact of afforestation on drained peatlands indicates that historical planting on these lands had adverse impacts on climate and biodiversity. The Council recommends that Government recognises landowners’ need for resources and practical guidance to best manage these areas, including options for rewetting and rehabilitation, to enhance their carbon storage capacity and resilience to climate change. In addition, review and revision of the primary legislation regarding afforestation and the management of existing forest should be considered.</p>	<p>There is no evidence of progress to date on this specific recommendation. A recent Galway County Council decision against a peatland rehabilitation programme has created uncertainty. The need to clarity and guidelines remains a priority.</p>

9.9 The extraction of peat for horticulture is unsustainable and must cease. There remain a number of enterprises that continue to extract peat, in a number of instances without planning permission or an environmental licence. The government in collaboration with industry should enable the necessary research and development to identify alternative sustainable horticultural substrates.

There has been no obvious progress on alternative substrates. Management options for organic soils are being demonstrated on pilot farms across the country. The EIP Farm Carbon Project is an exemplar project in this regard which is attracting increased attention.

€1.69m was awarded by the DAFM to a research project 'Beyond Peat' which commenced in 2022. The project is co-ordinated by Teagasc Horticultural Development Department, with project partners from the Technological University of the Shannon, University College Cork, University College Dublin, University of Limerick and the Agri-Food and Biosciences Institute in Northern Ireland. The project aim is to identify full and partial replacements for peat within professional horticulture, preferably with materials sourced within Ireland. The project is progressing well and to schedule and will run from 2022 to 2027. Different materials are being investigated currently for their suitability and availability. This research is at a very early stage and time will be needed to produce any substantial results and allow for suitable trials to be completed and analysed.

Separately, research projects on peat alternatives continue to be funded through the EU producer organisation (PO) scheme for fruit and vegetables implemented by officials in DAFM. Trials are ongoing in this area, and the results are promising, and it appears that a substantial reduction in peat

usage for casing in the mushroom industry may be achievable.

Biodiversity

10.1 An ambitious and adequately resourced policy framework is needed for the conservation and restoration of biodiversity. This framework should be aligned with and support the achievement of the National Climate Objective.

The 4th National Biodiversity Action Plan (NBAP) (2023-2030) was published on 25 January 2024. It is partly aligned with the ambitious Global Biodiversity Framework and is to be reviewed and aligned with the National Restoration Plan (once that has been prepared by 1st September 2026). There is a commitment to expand the network of national parks and nature reserves but no target given and other targets in the NBAP are general in many cases. The NBAP does contain actions that are to contribute to the National Climate Objective (mainly around nature-based solutions (NBS) and peatlands restoration) and calls for biodiversity to be explicitly considered in the next SAPs.

In terms of finance, one target is that by 2024, funding is secured to implement long term biodiversity conservation and restoration and reference is made to the Infrastructure, Climate and Nature Fund to support long term conservation and restoration measures. NBAP contains commitments to develop a National Restoration Plan by 2026 which is also now mandated in the EU regulation on nature restoration which came into effect on 18 August 2024.

10.2 A holistic and coordinated across Government approach to nature-based solutions is now needed, targeting different land uses and habitats, including the urban and built environment, coastal and marine habitats, agricultural land, forests, peatlands, and riverine and freshwater environments. All sectors and local authorities should identify and implement appropriate nature-based solutions and integrate them within climate action plans and sectoral adaptation plans.

A national biodiversity working group has been established to oversee the implementation of NBAP. The NBAP has a target for nature-based solutions to be contributing to national climate ambitions by 2025– with specific actions for DECC, DAFM, DHLGH, Local Authorities and CAROs to promote terrestrial, marine and coastal NBS in national, regional and local rural and urban programmes.

NBS for adaptation are promoted as a guiding principle of the National Adaptation Framework (2024) and the next cycle of SAPs will be encouraged to employ NBS options, where practicable and effective, to reflect the biodiversity-rich ambition of the National Climate Objective.

NBS feature quite prominently in most of the local authority Climate Action Plans with actions focusing mainly on sustainable approaches to urban drainage and incorporation of NBS in social housing projects, flood risk schemes and development of greenways and active travel routes.

The National Implementation Strategy for NBS to assist in management of rainwater and surface water runoff in urban areas was published in May 2024 and NBS must now be included in providing new or modifying existing urban roads and streets in terms of the Design Manual for Urban Roads and Streets (DMURS) Advice Note 5.

10.3 The Council recommends that the restoration of degraded carbon stocks such as peatlands, salt marshes and seabed grasses within special areas of conservation, special protected areas and national heritage areas should be prioritised

Outcome 2C of the NBAP is for biodiversity and ecosystem services in the wider countryside to be conserved and restored. This contains actions to rehabilitate and restore peatlands via Bord na Móna, NPWS, DECC, DAFM and Coillte in line with the National Peatlands Strategy, Climate Action Plan targets and National Raised Bog SAC Management Plan (2017-2022) and NPWS commits to "escalating" blanket bog restoration.

Another action under outcome 2C is for NPWS and other relevant bodies to promote freshwater, transitional, coastal and marine NBS (such as coastal and wetland restoration and restoring blue carbon ecosystems e.g. seagrasses and salt marshes). Research into the maritime area on habitats of importance to climate resilience, carbon capture and storage is a priority in the NBAP and CAP24.

Just Transition

11.1 The Council recommends that evidence-informed Just Transition pathways to reduce national greenhouse gas emissions and to build adaptive capacity and resilience towards climate change are developed across all sectors.

Progress was made to integrate the Just Transition principles across sectors in the CAP24. However, a lack of Just Transition specific actions in the annex of actions is evident.

11.2 The Council recommends that a set of national indicators is identified to measure the implementation of the Just Transition principles across policy actions.

DECC, through the EPA Policy Call, has secured a researcher to inform the development and adoption of a new Just Transition Indicators Framework. The CCAC Secretariat provided feedback through a consultation process to inform

	<p>suitable Just Transition indicators and identified useful existing indicators that could be used to measure a Just Transition. This research is due for publication Q4 2024. As part of the work programme, the Just Transition Commission will provide recommendations on a set of Just Transition indicators to support measurement of progress, over time, in achieving a Just Transition.</p>
<p>11.3 The need for sustained dialogue with representatives from across all of Irish society is required to ensure equitable and fair outcomes. This should be grounded in evidence based best practice that ensures an inclusive representation of Irish society. Therefore, it is recommended that a transparent methodological approach is identified that supports the implementation of social dialogues that are grounded in evidence-based best practice.</p>	<p>The Just Transition Commission will be responsible, as laid out in the ToR, for providing advice on the strengthening of the local and community dimensions of Just Transition and strengthening engagement with vulnerable cohorts into Ireland’s climate engagement activities, in particular the National Dialogue on Climate Action, as well as sectoral dialogues.</p>
<p>11.4 Understanding vulnerability in the context of a Just Transition is essential. Vulnerability assessments across society, the economy, the environment and health are required to ensure a Just Transition across all sectors. This will ensure the protection of workers and those who will be negatively affected by the transition but will also identify vulnerable groups more broadly such as vulnerable communities.</p>	<p>The Just Transition Commission will be responsible, as laid out in the ToR, to undertake an analysis of the potential impacts on Ireland’s workforce, and policy implications, of achieving the statutory 2050 climate neutrality objective; including examining the potential overall employment implications, which sectors of the economy may be most adversely impacted, which sectors may be expected to see significant employment growth in the decades ahead; and an examination of the geographic distribution of these impacts.</p> <p>The recently published Sectoral Adaptation Plan Guidelines</p>

	<p>states 'integration of adaptation at the sectoral level should aim to assess the impacts of adaptation actions in terms of maladaptive outcomes, exploiting synergies across sectors, addressing social vulnerability, and delivering just resilience.' The guidelines stipulate this should be done through sectoral risk assessment which should incorporate a vulnerability assessment.</p>
<p>11.5 To ensure that Just Transition principles are being embedded across the development and implementation of climate policies, engaging strategic expert advice through the establishment of a Just Transition Commission is recommended.</p>	<p>The Just Transition Commission is established on an administrative basis by Government Decision of April 2024. A function of the Just Transition Commission is to evaluate, advise, and comment on policy planning and implementation and progress on the application of Ireland's Just Transition principles into national and sectoral climate policies, based on high-quality, evidence-based analysis.</p>