

NECP Initial Public Consultation,
Strategic Energy Policy Division,
Department of Communications,
Climate Action & Environment,
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To whom it may concern,



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RE: Initial Public Consultation on the National Energy & Climate Plan (NECP) 2021-2030

The Climate Change Advisory Council welcomes the publication of the Initial Public Consultation on the National Energy and Climate Plan (NECP) 2021-2030. The Council notes the importance of this plan in the international context and in addressing climate change in Ireland by reducing greenhouse gas emissions and enhancing resilience to the impacts of climate change.

It is clear that the initial public consultation is not a draft of the plan itself, but rather an invitation to consult on the NECP process and an opportunity for interested stakeholders to give feedback at an early stage of the plan's development. However, without seeing the draft plan and the analysis and modelling, that provides supporting evidence for the plan, the Council are, unfortunately, unable to provide advice or recommendations at this stage of the consultation.

The Climate Change Advisory Council has made a number of recommendations through the contributions of the [First Report](#), [Periodic Review Report 2017](#), [Annual Review 2017](#) and [Annual Review 2018](#) and also through the consultation processes of the [National Mitigation Plan](#) and the [National Adaptation Framework](#), the [Draft Electricity and Gas Network Sectoral Adaptation Plan, among others](#), and information provided by the [Council on the EU ETS](#) which can all be viewed on the Council website www.climatecouncil.ie. These reports, along with the messages and rationale contained within, can be utilised by the Department in the drafting of the NECP and should be considered as the official response to this initial consultation.

In the development of the NECP it is critical that the links between mitigation and adaptation are fully understood and considered. A detailed risk assessment of all proposed actions, measures and policies is also required. The NECP must ensure that action taken on mitigation is consistent with adaptation planning and the national policy objective to achieve transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050.

Additionally, the Council notes that Mr Martin Finucane, Principal Officer, Department of Communications, Climate Action and Environment with responsibility for the NECP will be attending the Climate Change Advisory Council on the 30th November to discuss the draft NECP along with other matters in further detail. Should there be anything specific that the Department would like the Council to address as part of this exchange, it would be helpful to have an immediate indication of what these points are likely to be so the Council may adequately prepare.

The Council would also request that the Department outline its proposed process in meeting its obligations under the Climate Action and Low Carbon Development Act 2015 for consulting with the Climate Change Advisory Council on ‘any policy of Government, or any policy that is proposed to be submitted to the Government for approval relating to the reduction of greenhouse gas emissions, and adaptation to the effects of climate change in the State [11 (1(d)(i),(ii))]', specifically the NECP, to ensure that the Council can make itself available to facilitate such consultation.

The National Energy and Climate Plan is integral in terms of setting out a pathway to achieve transition to a low-carbon, climate-resilient and environmentally sustainable economy and society by 2050. The Council looks forward to engaging with Department on this, and eagerly awaits the more detailed draft following on from this initial consultation.

Should you wish to clarify any of the points above, please contact myself directly or the Climate Change Advisory Council Secretariat info@climatecouncil.ie or phone 01 2680180.

Yours sincerely,

Prof. John FitzGerald

Chair

Climate Change Advisory Council