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Dear John, Mark

RE: National Climate Action Plan 2023 Delivery

2023 is as a critical year of delivery for national climate action to meet the ambition of the Climate Action and Low Carbon Development Act. Under the Act, Ireland's cumulative emissions to the year 2030 must remain within the Government agreed carbon budgets. For this to be achieved, it is crucial that Ireland is put on a downwards emissions trajectory in 2023.

Given the urgency of the challenge as articulated in the Act, any delay in delivery of actions identified in the National Climate Action Plan risks failure in achieving the overall 2030 objective. It is important to acknowledge that delays in implementation will lead to higher emissions than anticipated which will need to be addressed in subsequent plans.

It is the Council's mandate to assess progress towards the national climate objective. The Council is conscious that engagement with Government Departments helps fulfil its mandate, particularly with respect to the exchange of information regarding the implementation of the policies and measures identified by Government in the National Climate Action Plan. This has been facilitated by the very open and participative dialogues with the respective Departments copied in this letter, (Department of the Taoiseach, Department of Environment, Climate and Communications, Department of Public Expenditure and Reform, Department of Finance, Department of Agriculture, Food and Marine, Department of Transport, Department of Enterprise, Trade and Employment and Department of Housing Local Government and Housing) which the Council particularly appreciates.

Departments have been assigned responsibility for the Sectoral Emissions Ceilings and the delivery of critical actions in the National Climate Action plans and its Annex of Actions. There are a number of actions which are announced for Quarter 1 2023 that appear to be delayed or behind schedule. We would highlight the following as those we feel are most critical:

- a) Implement recommendations from the District Heating Steering Group report, in accordance with implementation timetable - Finalise Steering Group Report and submit to Government (action BE/23/28(TF))
- b) Finalise research on marginal abatement cost of reaching our climate targets in order to revise the shadow price of carbon appropriately & Complete a review of how we assess the emissions impact of infrastructure investment (actions CP/23/24/A and CP/23/24/B)
- c) Complete and publish System Services Future Arrangements Phase III: Detailed Design and Implementation Transition Pathway (action EL/23/18)
- d) Implementation of Coillte Strategic Vision (action LU/23/2)
- e) Under the Nitrates Regulations impose mandatory requirements under derogation to enhance carbon sequestration (action LU/23/8)
- f) Finalisation of the scoping report on Coastal Change Management (action AD/23/6)

Further we note that a number of actions delivery dates were postponed after the original publication of the Annex of Actions. These include actions originally scheduled for delivery in Q1 2023, in respect of a policy/regulatory roadmap for green hydrogen and the establishment of a taskforce regarding acceleration of renewables.

We urge that the Climate Action Delivery Board ensures that there are no further delays to implementation of any of these actions. Further we ask that you, in your role as Co-chairs of the Climate Action Delivery Board, seek out and provide explanation as to why these actions are delayed and provide the Council with details as to when these actions are likely to be delivered.

Additionally, the Council remains concerned that there are two major elements to the carbon budgets that are outstanding: the sectoral emissions ceiling for LULUCF and the issue of the unallocated savings for the second Carbon Budget period.

I look forward to hearing from you on these important matters.

Regards,

Marie C. Donnelly

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Chair

Climate Change Advisory Council