



Submission on the Clean Air Strategy for Ireland

April 2022

Dublin Chamber is the representative body for businesses in the Greater Dublin Area, with a diverse membership base spanning the spectrum from start-ups and SMEs to major multinational companies. Dublin Chamber has for more than a decade been a strong voice for sustainability and the importance of the business role in achieving national climate action goals. The Chamber is committed to upholding the UN Sustainable Development Goals (SDGs) and, in particular, works in support of Goal 11 Sustainable Cities and Communities, Goal 8 Decent Work and Economic Growth, Goal 9 Industry, Innovation and Infrastructure, Goal 5 Gender Equality, and Goal 13 Climate Action. The Chamber is leading the way in preparing businesses for the transition to a green economy through its Sustainability Academy, which offers participating businesses a comprehensive range of supports including training in green public procurement. Ambitious measures are needed to accelerate Ireland's transition to a sustainable and innovative economic model that will form the basis for prosperity in a rapidly changing world. This submission outlines key points that should be taken into consideration when finalising the Clean Air Strategy for Ireland.

Air pollution continues to cause significant damage to Ireland's health and environment. Changes are necessary to move Ireland towards a cleaner environment and a lower carbon sustainable economy. Ireland's air quality is currently described as "good, relative to other European Union Member States" according to the Environmental Protection Agency. However, maintaining this standard is proving increasingly difficult, and indeed more ambition needs to be demonstrated in attempting to go beyond simply "good".

Two of the biggest drivers of Ireland's air pollution are transport and solid fuels. In 2019, Ireland's vehicle fleets accounted for 20.3% of the country's total CO₂ emissions (according to the EPA's 44 Provisional Greenhouse Gas Emissions report) and 40.6% of nitrogen oxide (NO_x) emissions (according to the Informative Inventory Report). The make-up of the Irish vehicle fleet plays a significant role in determining ambient air pollution levels.¹ Ireland ranks poorly in comparison to its European neighbours when it comes to Electric Vehicle take up: only 5% of new vehicles in Ireland in 2020 were EVs, compared to 25% in the Netherlands and 75% in Norway.² This is largely due to the lack of charging infrastructure that has been rolled out, Ireland ranks joint last among 12 European countries evaluated in a report by the REA in this regard.³ Currently there are approximately 41,000 EVs on Irish roads and 1,350

¹ <https://www.gov.ie/en/consultation/0a7cf-consultation-on-the-clean-air-strategy-for-ireland/>

² REA, Energy Transition Readiness Index: <http://www.nnebooks.co.uk/REA/Energy%20Transition%20Readiness%20Index%202021/index.html>

³ REA, Energy Transition Readiness Index: <http://www.nnebooks.co.uk/REA/Energy%20Transition%20Readiness%20Index%202021/index.html>

public charge points.⁴ Much will need to be done if Ireland is to reach its goal of 1 million EVs by 2030, as laid out in the Climate Action Plan. Investment in charging infrastructure, and the acceleration of planning around this is one key solution.

Given the slowness of electrification in Ireland, attention must be paid to pollution created by the burning of solid fuels. There is an urgent need for individual consumers to make behavioural changes within existing parameters. This necessitates a strong communications strategy that makes these complex and somewhat abstract concepts, real and relatable to the average consumer. Dublin Chamber therefore welcomes the inclusion of the strategic priority: “To promote and increase awareness of the importance of clean air”. Key to this is the need to address the public on a micro level, similar to how schemes such as “tidy towns” operate. Clear and widespread communication on the levels of air pollution in local areas will be central in encouraging individuals to change their habits. In this regard, the Department should engage with local authorities on how best to develop a communications strategy that resonates with local communities. The Department should also establish cooperation with local businesses, many of whom have the resources to support such campaigns as part of their corporate social responsibility agenda.

Dublin Chamber calls for the Department to show ambition and aim to not only maintain but to improve Ireland’s air quality levels. This can be achieved primarily through the acceleration of Ireland’s electrification, but in the meantime through a targeted communications strategy to encourage individual consumers to change their habits. In this regard the Department should seek to collaborate with local authorities and local businesses to ensure a wide-reaching communications strategy is developed.

⁴ <https://home.kpmg/ie/en/home/insights/2021/12/road-one-million-electric-vehicles-sustainable-futures.html>