

Sectoral Emissions Ceilings

Q5: What do you view as the main challenges/obstacles to the Sectoral Emission Ceilings being met?

[REDACTED] DAA:

Buy in across sectors and political agencies.

Carbon Pricing & Cross-Cutting Policies

Q6: Are there any unintended barriers within the planning system that should be addressed at national policy level in order to deliver our climate ambitions?

[REDACTED] DAA:

We need to be able to expedite certain critical infrastructure in order to achieve decarbonisation targets. There are many barriers that restrict this, so these need to be systemically reviewed.

Q7: What further opportunities exist within our taxation system, beyond measures already implemented and planned, to promote emissions reductions, either on an economy-wide basis, or in specific sectors?

[REDACTED] DAA:

VAT is charged at 13.5% on both electricity and gas usage. However, to encourage low-carbon technologies, which are based on electrification, a lower rate of VAT on electricity would be an excellent driver to promote emissions reductions.

We need efficient and effective taxation approach to address the transition needed to support alternative fuels - such as biofuels, sustainable aviation fuels (SAF) and green liquid hydrogen. Without financial supports and a beneficial taxation approach, Ireland will miss the opportunity held in the production of these fuels, and may not be able to support a decarbonised transport system.

Q8: Further to recent reforms to Ireland's green budgeting and public procurement policies, are there any additional measures that could be taken to integrate climate considerations into these policy frameworks?

DAA:

Further guidance on carbon pricing and accounting for sustainability measures in procurement.

Q9: Are there any significant cross-cutting gaps not previously discussed in Climate Action Plan 21 that need to be addressed?

DAA:

The CAP 2021 does not adequately address transport modes other than cars and buses. As the largest transport hub in Ireland, Dublin airport is left out of the CAP21. The daa operate critical national infrastructure (at both Dublin and Cork Airports) yet we are not recognised under the current CAP as key actor in decarbonising transport in Ireland.

The CAP 23 needs to priorities alternative modes of transport for Ireland including the priority of SAF and green hydrogen for aviation transport and the development and funding from the state in delivering a rail transport, such as the metro, to Dublin Airport. Identifying how to support sustainable aviation and development of sustainable infrastructure for the good of the national economy.

Q10: Are there any other cross-cutting issues that should be considered in the development of the 2023 Climate Action Pan?

DAA:

The CAP 2021 does not adequately address transport modes other than cars and buses. As the largest transport hub in Ireland, Dublin airport is left out of the CAP21 and this should be recognised in further iterations. The daa operate critical national infrastructure (at both Dublin and Cork Airports) yet we are not recognised under the current CAP as key actor in decarbonising transport in Ireland.

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Public Sector

Q73: What opportunities exist for the public sector to step up its climate ambition?

[REDACTED] DAA:

We need more expertise and skilled people working on this issue in public sector

Q74: What sort of practical changes would you expect the public sector to make in leading and delivering Ireland's climate ambition?

[REDACTED] DAA:

Reducing the bureaucracy around this transition and facilitating innovation.

Q75 How can the public sector lead wider society to change? In the short-term, medium-term, long-term?

[REDACTED] DAA:

We need more expertise and skilled people working on this issue in public sector

Q80: Where can the most optimum investment be made by the public sector in climate action?

[REDACTED] DAA:

scaling and ensuring effective financial investment in sustainable solutions.

Renewable Gases

Q13: What role does renewable gas have in the power generation sector?

[REDACTED] DAA:

renewable gas has significant potential in Ireland, particularly where it can be injected into the grid without changes to infrastructure.

Enterprise, Waste & Circular Economy

Q23: How can we encourage the diversification away from products with high levels of embodied carbon, such as traditional cement in construction to lower carbon alternatives?

 DAA:

We need to empower people working in procurement to understand the market and increase education by suppliers. We should also share information to inform large buyers and speed up procurement of the most sustainable materials.

Q24: What role could Carbon Capture and Storage (CCS) have on industry, and what steps would encourage its deployment?

 DAA:

There is a role for CCS in difficult-to-abate industry sectors, such as aviation. However, without the policy framework and roadmap for provisions of CCS, this becomes very challenging. Dublin airport would be an ideal exemplar site for CCS opportunities to show a pathway to its deployment.

Q25: What other opportunities exist to drive the decarbonisation of the enterprise sector?

 DAA:

There is a need to prioritise and expedite the decarbonisation of energy in Ireland, and hydrogen will play a key role. Many of our carbon reduction targets depend on successful decarbonisation and although advancements in technology and in alternative fuels will go hand in hand, we need a clear path to decarbonised fuels to allow for technological innovation and industrial application at scale. As such, the timelines for this ambition should be clear, fast, and authoritative. The government should work closely both with the industry supplying fuels but also with the key players in the industries developing demand and taking risks in technological advancement.

Q26: What measures should be taken to address the risks that climate change poses for enterprise?

 DAA:

Education, financial support, simplification of bureaucratic systems.

Q27: Are the measures that can be taken to assist businesses sustain the additional operating costs associated with moving to new low-carbon technology?

[REDACTED] DAA:

VAT is charged at 13.5% on both electricity and gas usage. However, to encourage low-carbon technologies, which are based on electrification, a lower rate of VAT on electricity would be an excellent driver.

Q71: What are the main barriers to consumers embracing the Circular Economy, e.g. lack of awareness, increased costs compared to disposable products, lack of access to circular goods and services?

[REDACTED] DAA:

understanding the concept, and understanding how to apply it. Costs and access to goods. Advertising and mixed messaging coming from fast fashion and consumer goods industry.

Q72: What other opportunities exist to support decarbonisation through the acceleration of a transition to the circular economy?

[REDACTED] DAA:

Expanding the understanding this concept and workshopping the potential. A new waste hierarchy, where recycling is not seen as pinnacle (communicated to the public)

Electricity

Q13: What role does renewable gas have in the power generation sector?

[REDACTED] DAA:

renewable gas has significant potential in Ireland, particularly where it can be injected into the grid without changes to infrastructure.

Q19: What are the regulatory challenges for reaching the renewable energy share targets?

[REDACTED] DAA:

Access to materials and infrastructure. Expediting the planning system to facilitate transition.

Transport

Q42: What Obstacles exist in the planning system that may prevent greater modal shift from being achieved? Are there specific measures that can be implemented to avoid further forced car dependency or lock-in of unsustainable practices?

[REDACTED] DAA:

Prioritise cycle and walk ways, and retrofit urgently to ensure safe spaces. Planning systems is not long term / outward looking enough. Ensure that you engage with all transport types - including aviation, and especially with airports who are major hubs for ground transport.

Q43: What changes should be considered in relation to the management of Ireland's road network (e.g. reducing speed limits, parking policy, road user/congestion charging) to reduce congestion and support the prioritisation of more sustainable modes?

[REDACTED] DAA:

More public transport. Cheaper / free public transport.

Q44: What additional measures should be considered to improve the quality or attractiveness of active mobility solutions as an alternative to private car use (e.g. dedicated lanes, secure bike parking, rest areas).

[REDACTED] DAA:

Bike parking, safe cycle and path ways, More public transport. Cheaper / free public transport.

Q45: What policies or measures can be considered to further incentivise the use of more sustainable modes of transport for education and leisure-related journeys?

[REDACTED] DAA:

Bike parking, safe cycle and path ways, More public transport. Cheaper / free public transport.

Q46: What potential do blended working policies or remote working hubs have to help reduce commuting travel and volume of transport emissions?

[REDACTED] DAA:

Significant. These are not going away so we should maximise the benefit of these policies by encouraging employers, supporting employees with tax reduction and addressing the cost of public transport commuting - as many people will still have to pay for full time commuting costs even if they are only commuting part time.

Q47: Is the level of transformation required of our transport behaviour patterns well understood and what more can be done to demonstrate the benefits of modal shift? How can the overall impact of wider decarbonisation measures be measured most effectively (e.g. capturing wellbeing impacts, health impacts, liveability, permeability, etc.)?

[REDACTED] DAA:

No, I don't think it is understood or appreciated.

Q48: How can EV and other transport grants/supports be more targeted (spatially, demographically) to deliver additional emissions reduction or address distributional impacts in a more equitable manner?

[REDACTED] DAA:

Passengers travelling to Dublin airport have limited opportunity when it comes to mode of transport. Until this changes, we need to support EV drivers driving to the airport. This can be achieved by replicating the Low Emissions Vehicle Toll Incentive (LEVTI) for Car parks at Dublin and Cork Airport. LEVTI scheme is funded under the Carbon Reduction Programme, with the objective of reducing transport emissions and building a climate resilient low carbon transport sector by 2050. DoT could extend this scheme to car parks at Dublin and Cork by providing a % reduction in car parking cost for passengers until alternative modes of transport to our airports are put in place.

Q51: What specific policies can assist in reducing the overall volume of ICE vehicle kilometres driven? Is there further scope to effect a change in the composition of the private car fleet to shift the vehicle mix away from higher emitting classes?

[REDACTED] DAA:

Large scale deployment of charging stations, as well as agreed plans - as much of this infrastructure needs to be planned far in advance.

Q55: As a transitional fuel to help decarbonise the road haulage sector, what obstacles do you foresee in raising the blend proportion of biofuels in road transport to 10% bioethanol (E10), and 20% biodiesel (B20) by 2030? Is there potential for greater ambition?

[REDACTED] DAA:

There is significant potential for great use and ambition here, without significant infrastructural change. However the challenge will be the security of supply. This should be addressed urgently to ensure that we don't miss the opportunity for Ireland nationally.

Q56: What expectation or level of public transport service is appropriate in rural communities and what other key measures can support a transition to sustainable modes?

[REDACTED] DAA:

Everyone in Ireland should be able to reach our airports and other important national infrastructure via public transport. This is a very important service to provide for both urban and rural dwellers.

Q57: What infrastructure or further measures are required to help improve the safety of rural roads and further incentivise the use of walking and cycling for shorter journeys in rural areas?

[REDACTED] DAA:

Dedicated lanes and lighting.

Agriculture & LULUCF

Q64: What can be done to increase sequestration through forestry (afforestation, extended rotations, and improved forest management)?

DAA:

Improved forest management at scale, effective payment for forest sequestration, scaling potential to allow for commercial engagement in this

Built Environment

Q30: What immediate actions can we take to address the skills shortage in the construction sector, to facilitate meeting our annual retrofitting targets?

DAA:

apprenticeships and short practical courses for upskilling people who are already skilled. This needs to be done urgently and should be supported financially by the government to ensure Just Transition

Q31: How can we ensure that necessary skills will be available to support district heating projects?

DAA:

apprenticeships and short practical courses for upskilling people who are already skilled. This needs to be done urgently and should be supported financially by the government to ensure Just Transition. We also really need to work with planners to ensure that they can identify DH opportunities early.

Q34: How could the roll-out of district heating be accelerated and what needs to be done to expand its coverage in Ireland?

DAA:

We also really need to work with planners to ensure that they can identify DH opportunities early. Work directly with Waste heat procurers and large heat users to identify opportunities and facilitate discussion. This should be done with all the players involved, and offer opportunity to speed up planning for this type of development.

Q35: Are there any specific obstacles in the planning system that is impeding the rollout of district heating and the national retrofit plan? How can we overcome these barriers?

 DAA:

We also really need to work with planners to ensure that they can identify DH opportunities early. Work directly with Waste heat procurers and large heat users to identify opportunities and facilitate discussion. This should be done with all the players involved, and offer opportunity to speed up planning for this type of development.

Research & Innovation

Q93: Are there important areas of research and innovation, where Ireland currently does not have sufficient capability, that need to be developed? If so, what are these areas?

 DAA:

Biofuels for transport - including Sustainable Aviation Fuels. Green Liquid Hydrogen for transport. Maximising district heating.

Q94: Is the research and innovation system developing and retaining the skills needed to deliver on our climate ambitions?

 DAA:

Not now