

**Public Consultation: Climate Action Plan**

**Submission - TASC**

**20th September 2022**

**TASC – Think-tank for Action on Social Change**

This submission is made on behalf of TASC, an independent think-tank whose mission is to address inequality and sustain democracy by translating analysis into action. TASC's Constitution presents its main objectives as:

1. Promoting education for the public benefit
2. Encouraging a more participative and inclusive society
3. Promoting and publishing research for public benefit

TASC engages in research and public outreach concerning inequality, democracy, and climate justice in the current political, economic, and social environment. Through its work, TASC seeks to increase public knowledge of economic and social policy, improve working conditions, facilitate a just transition to advance climate action and protect livelihoods and communities, and more generally, contribute to positive social change in Ireland and the EU.

**Introduction**

TASC welcomes this public consultation on the government's upcoming climate action plan for 2023. As a founding member of the Just Transition Alliance alongside trade unions and environmental NGOs, TASC firmly believes that if the transition to zero emissions is to be fast, it must be fair. In line with climate justice, the decarbonisation of all sectors must take a people-first approach, support the most vulnerable and marginalised, and ensure that the benefits and burdens of climate change are shared by

all. Alongside conducting research in areas such as democracy, social inclusion and equality, climate justice represents an integral element of the work conducted by TASC. To the forefront of TASC's work has been the development of the People's Transition model. The People's Transition positions climate action as being an enabler of local development. It seeks to provide people and communities with ownership over the transition to zero-carbon societies. The underlying principles of the People's Transition are community-led local development, community wealth building, and cooperative ownership.

The following submission responds to the questions relating to just transition outlined in the call for expert evidence.

**1. What types of supporting interventions should be considered by the Government to address the four principles of our Just Transition Framework within individual sectors?**

*1.1. An integrated, structured, and evidence-based approach to identify and plan our response to just transition requirements*

To ensure that a holistic and inclusive approach to planning transitions takes place, TASC recommends that an approach similar to that outlined in the People's Transition model is applied. The People's Transition is broken into three phases. The first phase focuses on preparing for a transition. This includes mapping the composition of a given community in areas such as demographics as well as the institutions and amenities which are in a facility. Other factors which could be considered include the knowledges and skills that are in place which could assist in securing a transition to a net-zero economy. As there is no 'one size fits all' approach to a just transition, this measure can ensure that the unique characteristics of the community undergoing a transition are identified at an early stage of the transition process. The second step in the People's Transition is undertaking dialogue. By listening to the needs, views and concerns of communities undergoing change, a tailored approach to developing solutions can be achieved. The final step of the People's Transition is the identification of solutions which can address the requirements of communities undergoing change. This can assist in securing buy-in for the move away from industries and practices which have been integral to local economies and the social life of communities.

*1.2. People are equipped with the right skills to be able to participate in and benefit from the future net zero economy*

Further education and the upskilling of workers represent an important aspect of securing a Just Transition. The study by Harrahill and Douglas (2019) includes re-training as one of four indicators for evaluating the success of a just transition. It notes that re-training for workers from a primarily low-skill base is vital for workers to have the necessary skills to work outside of pollutant industries. Within this study, both North-Rhine Westphalia (Germany) and Victoria (Australia) were identified to have

taken a proactive approach to support the re-training of workers. Potential areas for the upskilling of workers include mechanical, electrical and computer engineering training as well as trades such as construction which could help to address other areas relating to the climate action plan such as retrofitting. Training programmes in areas relating to business and technology could also assist in supporting the transition to a net-zero economy. Colleges of further education, education and training boards and technological universities could be potential providers of upskilling due to their reach within communities as well as their expertise in technical skills. As well as the provision of services, funding will be an important factor in ensuring people have access to the training and skills needed to participate in the net-zero economy. In Australia, the ‘Victorian Training Guarantee’ reduced the cost of receiving further training, thereby making these services more available to people.

*1.3. The costs are shared so that the impact is equitable and existing inequalities are not exacerbated*

To ensure that the transition to a net-zero economy does not exacerbate existing inequalities, TASC recommends that a windfall tax be applied to the excess profits of energy companies. Revenue generated could be recycled to support customers facing unaffordable energy bills. An example of this is the profits which have been generated by Bord na Móna (Maguire, 2022). While it is positive to see the semi-state body transition to renewables and generate profits from this sector. There is the potential for resistance if former employees feel left behind and lack adequate support for their personal and community-based transitions. For this reason, income generated by companies undergoing transitions must be used to support workers who have been displaced. In the area of agriculture, significant funds will be necessary to support the use of new technologies to enhance sustainability and create new income streams for sectors which are no longer viable. Given the imbalanced nature of certain value chains within the Irish agricultural sector, a windfall tax, entitled the ‘Agricultural Transition Fund’ could be applied to large agri-businesses with revenue generated being used to facilitate the transition of economically vulnerable farmers towards new value chains (O’Brien, 2019; Caden, 2022). Alongside its use for infrastructural developments such as biorefineries, financial aid could also be provided for administrative support such as the creation of cooperative bodies and the provision of training.

*1.4. Social dialogue to ensure impacted citizens and communities are empowered and are core to the transition process*

To the forefront of TASC’s work on climate justice has been the development of the People’s Transition model. The aim of the People’s Transition is to empower communities and ensure that climate solutions address the needs of communities. In order for just transition processes to be inclusive, measures must be taken to ensure that it is not only the ‘usual suspects’ who participate in decision-making processes (Rose et al., 2021 p.3). Within the People’s Transition report, McCabe (2020) outlines how these people tend to be professional, university-educated individuals with a range of skills and project management

experience. Anderson and Ron Balsera (2019 p.25) note that if the process of designing a just transition means simply opening 'the door to whoever turns up to discussions, then only those with time, money and organised lobbying capacity will be represented'. For this reason, they argue that considerations for power dynamics must be included in a just transition and actions must be taken to ensure that groups who are typically ignored within policymaking have an active voice in transition processes. Bodies overseeing just transition plans should therefore undertake measures which aim to ensure harder-to-reach communities are included in development plans. Given their role in developing the concept of just transition and their ability to represent workers, trade unions will also play a significant role in ensuring that workers and communities are at the core of transition processes. Within an Irish context, trade unions have been instrumental in creating the just transition alliance. The joint declaration of the just transition alliance outlines the need for a just transition 'to protect and create jobs, reduce emissions, enhance living standards and generate new opportunities that will help to build sustainable, resilient communities across the country' (Just Transition Alliance, 2022).

**2. What additional targeted supports should be considered to minimise the impact of our climate policies to those on low income or households that are most at risk from fuel poverty (including transport and heating)?**

In the area of energy poverty, TASC notes that there is an opportunity to scale up investment in energy efficiency and retrofitting measures that specifically support those that are currently experiencing, and are most vulnerable to, energy poverty. By prioritising win-win solutions to energy poverty and the urgent need for emissions reductions in the residential sector, connected societal issues such as substandard living conditions, energy poverty-related health issues, fossil fuel lock-in, and volatile gas and oil energy bills can be tackled in tandem. Research into blockages to retrofitting undertaken by Friends of the Earth earlier this year highlighted the challenges that low-income households face when it comes to retrofitting such as high upfront costs, a lack of awareness of available grants, and the perceived difficulty of the application process itself (O'Connor, 2022). TASC echoes the call for a substantial increase in social housing retrofit targets, the prioritisation of heat pumps over fossil fuel boilers under the Warmer Homes Scheme, community-scale approaches to retrofitting, and the recruitment of Community Energy Advisors to engage with hard-to-reach citizens and those most affected by energy poverty and support them in undertaking both shallow and deep retrofits (St Vincent de Paul, 2022).

Policy measures to tackle energy poverty must be tailored to support the most marginalised and vulnerable in society. Renewable energy subsidies favour those who can invest and disproportionately benefit well-off households (Stewart, 2021). Rooftop solar on social housing represents an opportunity to reduce the risk of fossil fuel lock-in for low-income families. The Department should act to level the playing field and ramp up the installation of rooftop solar on social housing (Friends of the Earth, 2022).

Research carried out by National Traveller Mabs in 2019 highlighted that Travellers living in mobile homes are unable to avail of retrofitting and SEAI grants despite Travellers being disproportionately impacted by energy poverty in Ireland (Stamp & Kearns, 2019). The potential for community-owned energy solutions was also highlighted in the research paper. Community-owned energy supports for Travellers and those most affected by energy poverty should be explored throughout the development of this strategy and access home energy upgrades grants for Travellers should be supported by the SEAI. Strong tenancy rights are crucial to achieving a socially just renovation wave, particularly in the rental sector. Research carried out by TASC in 2021 — *The People's Transition: Phibsborough* — recommends the involvement of a reputable third party to bridge the gap between landlords and tenants and act as a trusted intermediary whose goal is to build trust in the process and provide mutually beneficial choices to both parties where all stakeholders understand the benefit of a retrofit. This work would be well placed to be undertaken by a local retrofitting cooperative.

**3. Are there any emerging areas of vulnerability in specific sectors of the economy as a direct result of the implementation of Ireland's climate action policies?**

As noted within the *People's Transition* report, agriculture is a sector of the Irish economy which has high levels of economic vulnerability (McCabe, 2020). The statement within this report that poorly planned climate policy could have a detrimental impact on rural communities is highly relevant given the growing debate on the impact which agriculture has on the environment. Given the opposition to the agricultural emission scheme recently, there is the potential that a failure to apply a just transition to agriculture could lead to further resistance to climate policy as well as increased support for climate sceptic politicians. While incomes within agriculture range depending on the type of livestock produced, the Teagasc national farm survey notes that the average income for a beef farmer ranges between €10,927 and €16,416 (Dillon et al., 2022). Given the importance of subsidies to farmers, changes in these schemes could further reduce the incomes and viability of farmers. This is described as having problems not only for individual farms but rural communities at large. While the application of a just transition within agriculture is novel, it is welcome that the previous Climate Action Plan noted the potential for diversification options for farmers including the production of biomethane and energy, agroforestry and afforestation. Further steps which could facilitate a transition to these new income sources include the provision of knowledge transfer via networks such as Teagasc discussion groups and agricultural consultants. A major limiting factor for securing farm diversification is the cost that this will entail for farmers in terms of altering their farm practices and utilising new technologies. The provision of financial support is therefore critical to securing farm diversification. One measure for addressing this challenge is by providing finance for the creation of co-operatives bodies such as community-owned biorefineries which can ensure the wealth that is created is retained within local communities. The increased role of co-operatives can also ensure that new options for farm income do

not replicate negative aspects of the beef sector in terms of the power which processors hold over producers.

A further sector which has seen a limited focus on the application of a just transition is the aviation sector. Pre-Covid, over 21,000 people were employed in airport operations in Dublin airport alone while Shannon airport is viewed as being a critical infrastructural asset for the West of Ireland (Dublin Airport, 2020; Michael, 2022). Within the EU, aviation emissions account for almost 14% of total transport emissions (European Union Aviation Safety Agency, 2022). It, therefore, represents a sector which requires reforms. It is vital however to ensure that this occurs in a manner which ensures workers are supported. Given the experience of workers in the transport sector, and the necessity of increasing access to public transport across the country, this may represent an avenue for further investigation.

**4. How should Local Authorities seek to integrate just transition considerations into the preparation of their statutory Climate Action Plans?**

As noted within the study by Harrahill and Douglas (2019) on the implementation of a just transition in coal-dependent jurisdictions, the inclusion of local government within plans for the move away from pollutant practices can increase levels of support for policy decisions alongside the successful implementation of environmental policy. One area where Local Authorities could combat climate change while also addressing broader societal issues is by increasing the energy efficiency of all residential and non-residential properties under their remit. As discussed in the Phibsborough People's Transition, the creation of retrofitting co-operatives would not only assist in reducing energy poverty but also support the upskilling of workers and create new jobs. A further measure that local authorities could undertake with support from central government sources is an evaluation of the scale and types of jobs which are at risk within their locality due to the need to move away from pollutant practices. By identifying job and income loss vulnerabilities at an early stage, local authorities can take a targeted and proactive approach to attain a just transition and minimise job losses.

**5. What other issues should be considered by the Government to inform just transition policy in the 2023 Climate Action Plan?**

The study by Cipler and Harrison (2020) describes how policy relating to just transition should not only consider the move away from pollutant practices but also consider a broader range of topics. This includes racism, zero waste, gentrification and indigenous rights among other social issues. An all-of-government approach should therefore consider how just transition is relevant to individual government departments. This can ensure a transition to not only a more sustainable society but also a more just society. Within McCabe (2020), infrastructural issues such as internet connectivity were identified as an issue facing rural areas. On this topic, Halseth (2019) describes how the retrenchment of the role of the state has led to a vacuum for the provision of services which has not been filled by the private sector. It identifies Ireland, alongside the United Kingdom and Canada as three OECD countries which have

failed to provide high-speed internet to rural areas due to a lack of incentive for private sector operators. Just transition policy should therefore focus on how infrastructure can be enhanced in rural areas to support the transition to the green economy and secure new opportunities for rural areas.

**6. Should the proposed Just Transition Commission have any other functions in addition to those described above?**

While it is positive to see the emphasis that has been placed on supporting dialogue and governance within the creation of the Just Transition Commission, one area where there is a lack of consideration in the previous Climate Action Plan is the potential for the commission to evaluate alternative models of ownership within a just transition. About the European Green Deal, Clarke and Lipsig-Mummé (2020) and McCabe (2020) describe how it does not refer to the potential for changes in employment models, labour processes or the concentration of power. This reflects the view within Heffron and McCauley (2018) that while the implementation of the environmental policy may lead to a net-zero economy, it could still retain structures which lead to inequality. For a truly just transition, this must not occur. The People's Transition model developed by TASC seeks to avoid this by providing workers and communities with ownership of the transition to zero-carbon societies (McCabe, 2020). An integral element of the People's Transition is community wealth building, community-led local development and cooperative ownership. To ensure that the wealth created from novel green enterprises is retained within communities experiencing a transition, the Just Transition Commission should, where possible develop transition plans based on these three principles.

**7. What mixtures of skills and expertise are required on the Just Transition Commission?**

An important element of the application of a just transition is that it moves away from previous approaches to decision-making which were overly top-down in nature. By taking an inclusive approach whereby the knowledge and views of impacted communities (e.g., displaced fossil fuel workers or farmers) are included, more holistic plans which meet the needs of impacted communities can be developed. For this reason, it is integral that the Just Transition Commission includes groups who have a similar experience to those who will require a just transition following the implementation of climate policy. The study by Harrahill and Douglas (2019) found that union representatives played an important role in securing compensation for workers impacted by the decline in coal production in Alberta, Canada. For this reason, trade union representatives should be included in the Just Transition Commission. A limitation for other sectors which require a transition, namely the agricultural sector is the absence of an organisation similar to a trade union which can facilitate collective action. The presence of agricultural co-operative representatives could however benefit the Just Transition Commission due to their focus on the well-being of their members.

The Just Transition Commission also requires expertise regarding the identification of new ways of working and using land in terms of planning new means of generating income once traditional practices

which are no longer economically or environmentally viable go into decline. This may include experts in areas relating to renewable energy development or alternative approaches to land use. It is positive to see the growing emphasis on just transition within Irish policy documents over recent years. Other jurisdictions do however have had more experience in addressing issues relating to the decline of important economic sectors, particularly concerning fossil fuels. One example of this is Scotland. Its first Just Transition Commission met between 2019 and 2021. Including previous members of this commission could assist the Irish Just Transition Commission in terms of identifying good practices for the commission.

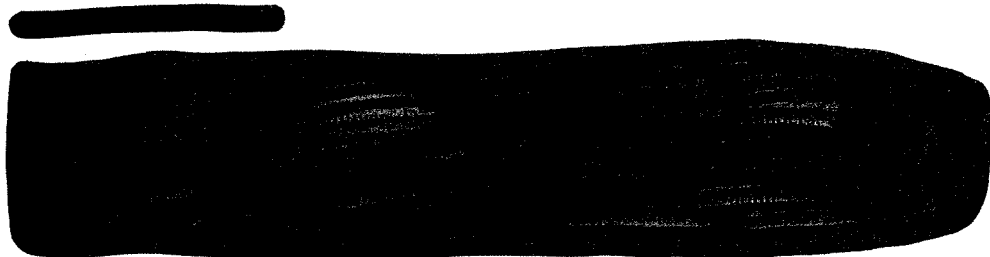
Thank you in advance for your consideration.

Regards,



On behalf of

TASC.





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