

1. Introduction

1.1 The Jesuit Centre for Faith and Justice Coalition welcomes the opportunity to respond to the Department's consultation. As a member of the Stop Climate Coalition, supports and endorses their submission. This submission will focus on a few relevant sections and questions. We would also like to acknowledge SCC's research which informed this submission.

The consultation does not make any reference to the onus on Ireland to do its fair share of the global effort to meet the goals of the Paris Agreement, specifically limiting temperature increase to "well below 2°C above pre-industrial levels and to pursue efforts to limit warming to 1.5°C". According to the principle of Common but Differentiated Responsibilities and Respective Capabilities in the 1992 UN Convention on Climate Change, and basic principles of climate justice, wealthy, high-emitting countries like Ireland, must cut emissions more steeply and quickly.

On this basis, the two carbon budgets to 2030, while challenging, are still well short of our fair share of the effort required to fulfil the Paris Agreement. Consequently, it is crucial that we not only achieve the goals we have set but they must represent the absolute minimum which we achieve. We need to aim for steeper cuts than we have currently legislated for.

Further, the consultation does not reference climate finance. Many of the world's poorest communities are already facing increased levels of flooding, drought and heat waves, disproportionately experiencing the worst impacts of climate breakdown despite having least responsibility for causing the crisis and least resources to adapt. This obvious injustice is recognised in successive international agreements, including the 2015 Paris Agreement, but wealthier, high-emitting countries - including Ireland - have to date failed to collectively provide the \$100bn per year pledged to help poorer countries deal with the worst impacts of climate change. Ireland must do its part in providing the vital climate finance needed by countries on the frontline of the climate crisis to help them invest in green energy and reduce their emissions, adapt to a changing climate and protect communities, and to address the losses & damages felt and rebuild when disaster strikes. It is an essential part of our global responsibility, a key commitment under the Paris Agreement. It should be part of any comprehensive Climate Action Plan and place specific responsibilities on all relevant parts of Government, including DECC, DFAT, DPE and D/Finance.

Section 2 Carbon Pricing and Cross-Cutting Issues

Ireland has committed to phasing out fossil fuel subsidies under the 2021 Climate Action Plan (Action 265), with a roadmap on transitioning away from fossil fuel subsidies due to be produced in Q1 2024 this does not reflect the urgency of transitioning away from fossil fuel subsidisation. Currently we subsidise fossil fuels through a variety of different means including public finance, tax exemptions, investments by state owned enterprises and fiscal support for industry research.¹ Removal of these subsidies and redirecting these finances towards renewable energy generation or retrofitting housing would make a significant difference in our emissions. In the short term the fuel allowance however should be maintained and enhanced to ensure those vulnerable to fuel poverty are protected. In the medium to long term however reliance on this subsidy should be reduced as homes are retrofitted to be warmer and more energy efficient.

Ireland's membership of the recently-formed Beyond Oil and Gas Alliance² (BOGA) is a positive development. It is important that Ireland's existing policy on exploration licensing aligns with BOGA commitments and does not allow for progression of existing licences in order to prevent fossil fuel lock-in. We also note that BOGA does not include coal, nor does it include imports of any kind of fossil fuel. A comprehensive limit on fossil fuel use will clearly also need to include coal and imports.

Further, the EU could seek to form a partnership with a group of Global South countries in order to coordinate their fossil fuel phase-outs in a socially just way, while also providing substantial climate finance³.

2. 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?

Carbon pricing will not, without complementary measures, lead to a reduction in emissions. The collection and use of its revenue should be optimised to ensure that price point is enough of a deterrent to nudge people into changing behaviour however the money raised should be used to ensure that alternatives exist and the most vulnerable are buffered from this regressive tax. While there are strong arguments in favour of carbon pricing in general, the specific details of the tax are of immense importance. Unlike many other taxes, the goal of the carbon tax is its own redundancy. The Jesuit Centre for Faith and Justice maintains that the best approach to maximising justice is the utilisation of the revenue generated by an increased carbon tax to establish a sovereign wealth fund. This fund can be targeted towards investment opportunities

¹ <https://www.jcfj.ie/article/meet-the-new-boss-same-as-the-old-boss-the-subsidisation-of-natural-gas-as-a-decarbonisation-pathway-in-ireland/>

² See: <https://beyondoilandgasalliance.com>

³ A proposal on this can be found in these two position papers from Feasta:
<https://www.feasta.org/2020/10/15/balancing-with-a-doughnut-feasta-position-paper-on-the-revision-of-the-european-commissions-energy-taxation-directive/> <https://www.feasta.org/2020/10/29/position-paper-on-the-eus-carbon-border-adjustment-mechanism/>

which encourage broad environmental adaptation and mitigation, while generating a universally distributed cash dividend every quarter. As demonstrated by other examples of similar wealth funds, most notably Norway, this approach can win broad political approval, encourage economic virtue cycles, and soften the impact of climate and eco-system breakdown on the poorest in our society. With the goal of decarbonization by 2050, this fund can be planned to grow in a sustainable and productive fashion, even after the tax no longer exists. Its benefits will long outlast any direct-cash scheme, while also offering an insulation to those who most need it, against the economic challenges brought about by climate breakdown.⁴ To ensure that this tax is not regressive even in the short term

Carbon pricing will certainly play a useful role in the energy transition, the Government should not rely on price-based policy instruments for emissions reductions. As this is a regressive tax it impacts the least well off most, however it is the wealthiest people who produce the most energy. Increasing prices for this cohort may not result in emission reductions. The tax needs to be complemented by other regulations and supports to ensure a transition into a low carbon society.

A major cross cutting issue that could be positively addressed is the issue of building dereliction and vacancy. In the current housing and homelessness crisis there is a great need for more homes. However, we also have a major issue in Ireland with underutilization of buildings, dereliction and vacancy. The embodied carbon within these buildings are therefore wasted. Retrofitting and restoring derelict buildings have the potential to offset some of the carbon emissions which would otherwise need to be emitted while building new homes. While it is positive that there are plans to introduce a vacancy tax to help ensure maximal use of residential buildings we also need to ensure that these taxes are collected and the policy enforced appropriately. Local Councils have not been able to collect the total amount of taxes owed,⁵ making the establishment of these taxes slightly redundant. A review into the circumstances surrounding the under-collection of these taxes, including recommendations of measures to ensure maximal revenues are collected, should be carried out. Taxes collected from this avenue should also be used primarily to subsidise and support the retrofitting of these buildings as well as retrofitting buildings of older, energy inefficient houses. This would have a threefold benefit of increasing building use, reducing residential building emissions and reducing energy poverty.

Section 3 Electricity

1. What options are available to increase the penetration of renewable electricity beyond the up to 80% committed to the Climate Action Plan 2023?

⁴ http://www.jcfj.ie/wp-content/uploads/2019/07/JCFJ_Submission_on_Carbon_Tax_Revenues_in_Ireland.pdf

⁵ <https://www.irishtimes.com/news/politics/councils-collected-just-378-000-in-derelict-site-levies-in-2020-1.4727295>

- Drive public participation in renewable energy with a solar PV rooftop revolution. Government should prioritise the rollout of solar PV on the rooftop of every school by 2025, and on the rooftop of 1 million homes by 2030. Recent MaREI research indicates that more than 1 million homes in Ireland have roof space and orientation suitable for 10 solar panels (equivalent to 3.4kW).⁶ This action would produce 25% of all residential electricity demand (2.2TWh),⁷ and would contribute to a culture change around the energy transition where citizens are at the heart of climate action.

Community and parish building also have huge capacity to produce renewable energy. Proactive engagement with community development agencies and parishes could facilitate an accelerated roll out. Clarity on what planning permissions are required for installation of solar on older and protected building should also be provided.

- Community owned renewable projects have the potential to transform the energy generation model, increasing public participation, reducing objections and provide low cost energy to those vulnerable to energy poverty.⁸ Unfortunately these projects are very rare in Ireland due to difficulties in grid connections, planning permissions and government support.

2. What can be done to accelerate/facilitate the delivery/deployment of offshore wind and solar PV in particular, in the context of Climate Action Plan 2021 and the REPowerEU ambition?

The following actions are critical for wind and solar deployment at a level that is carbon budget compliant in the period to 2030:

- a) Prioritise meaningful community involvement in renewable energy planning and development. This should include government-led information and engagement campaigns targeting host communities along our coasts at strategic planning stage i.e. prior to the development of individual projects.
- b) Ensure that planning barriers impeding the rollout of solar PV on the rooftop of every school by 2025, and on the rooftop of 1 million homes by 2030 are urgently removed.
- c) Accelerated roll out of MPAs to ensure appropriate placement of off shore infrastructure, reducing the negative impact on biodiversity.

⁶ Siddharth, J., Deane, P. (2022) Quantifying the potential for rooftop solar photovoltaic in Ireland. Available at: <https://www.marei.ie/wp-content/uploads/2022/07/Quantifying-the-Potential-for-Rooftop-Solar-Photovoltaic-in-Ireland.pdf>

⁷ Siddharth, J., Deane, P. (2022) Quantifying the potential for rooftop solar photovoltaic in Ireland. Available at: <https://www.marei.ie/wp-content/uploads/2022/07/Quantifying-the-Potential-for-Rooftop-Solar-Photovoltaic-in-Ireland.pdf>

⁸ <https://newlaborforum.cuny.edu/2021/05/17/irelands-energy-system-the-historical-case-for-hope-in-climate-action/>

10. To incentivise microgeneration.

Climate action and the need to decarbonise the energy system is an opportunity to democratise the energy system, and to give communities and householders the chance to generate, own and benefit from their own energy.

Special attention needs to be given to support all demographics and economic backgrounds to participate in the energy transition. The increasing number of people living in energy poverty would benefit most from reduced electricity bills as a result of having solar pv on their rooftop for example, but are unlikely to have capital available to make an investment. Likewise, farmers with dwindling incomes may have many large sheds and would benefit significantly from the potential income diversification, should be encouraged to participate. New financing models and direct grants should be considered to support those in energy poverty to participate. This should include community owned projects where the energy produced can be provided to the community at low cost having the added value of including households which do not have access to their own roof space for pv installation.

It is recommended that the government develop a community energy strategy with interested stakeholders to ensure that the energy transition is a shared societal project, and to support the ramping up of development and ambition far beyond the 500MW of community energy by 2030 as committed to in the Climate Action Plan 2021.

More financial and technical support for community energy is also needed to build greater community and societal support for the energy transition. Community and local ownership is also central to a just transition. To date Ireland's potential has been held back by regulatory issues and insufficient supports and incentives. The reserved capacity available under the renewables support scheme should be increased for community energy projects. Access to the grid is also a considerable challenge and the approval/consenting process needs to be sped up to support development.

Section 5 Built Environment

- a) Retrofit and install fossil-free heating in all social housing stock to B2, and install solar PV on all feasible social housing units, by 2030. Ensure all new social housing and cost rental stock is fossil fuel free and has renewable energy generation as standard.
- b) Accelerate the implementation of the Towns Centre First policy as described in the Programme for Government. Utilizing and retrofitting existing building stock in centrally located areas has huge potential to reduce emissions in the building sector (by reducing the necessity for new builds) and the transport sector (by facilitating people to live beside necessary services).

1. Currently SEAI provides approx. 50% of the grant of retrofit to Landlords, Housing for All commits to introducing a minimum BER for rented properties from 2025 onwards. What further supports can be put in place to address the split incentive when retrofitting rental properties (residential and commercial)?

- A well-signalled lead-in time will be critical to give time to landlords and investors to adjust,⁹ and these signals must begin ahead of planned introduction in 2025.
- Introducing technical and financial support for small landlords and tenants e.g. extending the Accelerated Capital Allowance scheme to private landlords;
- Improving security of tenure to incentivise tenants to invest in a property e.g. opening SEAI free upgrades for eligible homes programme to tenants receiving one of the required welfare payments and with a long-term, rent capped lease.
- Actively engaging with landlords to increase awareness of grants and benefits of retrofitting.

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

- Focus on diversification of the industry. Target upskilling and retraining to workers outside traditional construction background including women and those from ethnic minority backgrounds.
- Jobs in construction and retrofitting must focus on retention of workers by improving work conditions such as holiday/sick pay etc. Local Authorities could directly employ builders and retrofitters to work on social housing buildings as well as residential building which qualify subsidised retrofitting.
- Free upskilling for existing industry participants to increase knowledge of and confidence in new technologies e.g. free training for plumbers in heat pump technologies.

5. Housing for All Commits to 100% funding to retrofit 40% of local authority housing stock to B2 by 2030 at a cost of 1.4 billion euro. How can we further support local authorities to help them deliver on social housing retrofit targets?

- Significantly increase funding for the local authority retrofit programme. Retrofitting social housing can act as a testbed for projects aggregation, hence reducing costs and improving qualities.¹⁰
- Increasing the resources and capabilities within Local Authorities allowing them to undertake retrofitting and construction work in house.
- Actively engage with residents within social housing to increase support for retrofitting work. Ensuring that residents have alternative accommodation if necessary will be an important aspect of this work. Alternatively, research should be done to allow work to be done while residents remain insitu.

⁹ Irish Green Building Council - Introducing Minimum Energy Performance Standards in the Private Rental Sector <https://www.igbc.ie/wp-content/uploads/2019/06/IGBC-SEAI-Report-Final.pdf>

¹⁰ Irish Green Building Council submission to Ireland's 3rd Long-Term Renovation Strategy https://www.igbc.ie/wp-content/uploads/2021/01/IGBC_Submission_LTRS2020_final.pdf

6. In addition to the existing financial supports and policy measures, are there any other incentives/assistance needed to help homeowners upgrade the energy efficiency of their homes?

- Increased engagement and awareness campaign on the One-Stop-Shop services as well as the benefits of retrofitting on health outcomes as well as the more obvious financial benefits.

9. What policy levers are needed to encourage and support the retrofitting of shared properties e.g. apartments?

- Engage with property management companies to proactively look for solutions in terms of external work that could be done eg external insulation, installation community owned of solar panels.
- Requiring property management companies as well as development and investment companies which own apartments to report on work done to reduce carbon emissions from their property portfolios.

10. Further to the existing supports financed by carbon tax revenues, how can we protect those who are currently experiencing fuel poverty and those who are at risk?

- Insulate 100,000 homes in 2023, prioritising cheaper measures that save energy and money quickly. The focus must be on reaching those most at risk of energy poverty and those who rely on coal and turf by providing targeted free / low-cost retrofits. Do not wait for them to apply to SEAI for a grant, sit down with the likes of the SVP and Age Action to plan a coordinated outreach campaign offering wrap-around supports for retrofitting.
- Sliding scale of Home Energy Upgrade Grants based on means-test.
- Traveller families in mobile homes are particularly at-risk of energy poverty, with 77% living in energy poverty before the current energy crisis. Utilizing the funds available for housing for the travelling community highly insulated, culturally appropriate housing should be provided. Installation of solar panels in halting sites to provide renewable energy would also help reduce energy poverty.
- Extended ban on disconnections from energy suppliers for vulnerable households.
- Engage with households at risk of disconnections and fast tracking targeted interventions such as retrofitting or solar energy installation.
- For low-income households which do not qualify for 100% grants, low interest loans should be made available for retrofitting.
- Increase provision of energy efficient social and cost-rental accommodation. Rehoming those in precarious living situations such as those on the social housing list and those reliant on HAP and other housing assistants' into efficient centrally located homes reduces the risk of energy poverty dramatically.

11. What specific measures can be implemented to improve the efficiency of rolling out the National Retrofit Programme?

- Active engagement with communities. Establish pilot projects and actively promote results to the wider public.
- Ensure that the barriers associated with the grant application process are removed and the process is simplified and streamlined as much as possible.

14. What is the next step for geothermal energy application to the built environment?

Engage with owners of large, older, harder to retrofit buildings including churches to explore options of geothermal heating. Provide specific funding for geothermal infrastructure.

Section 6 Transport

Sustainable Mobility and Demand Management

1. 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?

- Planning for one-off houses in rural areas leads to an increase reliance on private car ownership. Implementing the Towns Centres First policy would help alleviate this issue.
- Planned housing estates with multiple car parking spaces per unit but a lack of good quality active transport infrastructure, including bike storage, is a barrier to modal shift.
- Both urban and rural areas suffer from car dominance with the result that active transport is unsafe for adults and children alike. Excessive speed on smaller, more rural roads coupled with lack of public transport servicing rural areas ensure that car dominance continues. Poor infrastructure in urban areas, particular at junctions, makes cycling an unsafe and unpleasant experience.

2. *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?*

- All roads surrounding national and secondary schools should have reduced speed limits. While it is positive to have the area direct in front of the school designated as a safe space, this does not protect students and parents as they commute to school. Ensuring safe routes to school, which would need to include reductions in speed, is vital to a national modal shift.
- A network of signed rural cycling infrastructure which utilizes existing road infrastructure for active transport could be established. Again this would include changes in speed limits along these roads.¹¹

¹¹ <https://cyclist.ie/wp-content/uploads/2020/07/A-Vision-for-Cycling-in-Rural-Ireland-V5-FINAL-23.07.2020-min.pdf>

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

A barrier for owning cargo bikes and bicycles in the city centre or in apartment blocks is lack of secure, sheltered bike parking facilities that is suitable for a wide range of bicycles and cargo bikes. Removing car parking spaces to install bike bunkers and sheltered bike racks would help remove this barrier. Engaging with community member to identify areas where this would be beneficial would also have the added advantage of increasing over stakeholder engagement.

Public Transport

- Ensure that all children can get to school without using a car by September 2023.
- Guaranteeing a free school bus place for all children who live more than 1km away from school. Invest in a fleet of electric buses and mini-buses.
- Building safe routes to school for cycling and walking within a 3km radius of every school.
- Closing more school streets to cars and use one way systems to make arrival at school on bike and foot as safe as possible and ban engine idling near schools.
- Work to transition all public transport to electric / hydrogen powered by 2030
- Develop a rural transport plan based on a vision of “every village, every hour”. This would need to be complemented by extensive communications and engagement to ensure maximal awareness and uptake.
- Implement the BusConnects projects, in conjunction with communities to optimise layout, and plan for bus connects type infrastructure for all towns above (e.g.) 50,000 people by 2030. Roll out light rail for denser populated towns including Galway.
- Better integrate active and public transport by increasing capacity within rail services for bicycles, this would be especially important for scenic and tourist routes. Establishing transport hubs, incorporating car and bike share at intercity train stations across the country would reduce the necessity of private vehicles at journey destinations.

Active travel:

- There is a large potential to make cycling in rural Ireland safer and more accessible. Reducing speed limits in local, narrow roads can create a broad cycling infrastructure where cyclists are expected.¹²
- The school run is one of the leading reasons for short car trips. The Government should work towards a target of all children being able to get to school by public transport and/or active travel by 2025.
- Prioritise safe cycle routes to schools and car free zones at school gates.
- Ensure that all future and existing cycling paths are physically segregated from roads and pedestrian paths, sign posted, maintained to a high standard and well lit. There is increased uptake in active transport, especially cycling, when the transport experience is pleasurable. Designing cycling infrastructure to incorporate green space etc, natural shade, and enough space that people can cycle side by side would be an importance aspect of this. This needs to include safe cycling infrastructure at junctions where cycling infrastructure crosses motor traffic infrastructure.
- Expand the bike to work scheme to €2,000 to accommodate and include eBikes.
- Introduce scrappage scheme where older cars can be swapped for cargo and ebikes.
- The Bike-to-Work scheme, established in 2009, is a tax incentive aimed at encouraging employees to cycle to work by facilitating the purchase of a bike at a price discounted by the amount of income tax that would normally be paid. A key limitation of this scheme is identified in its title: It targets only one type of journey, namely work commutes. Because of its design, it is limited in how useful it is in supporting a societal shift from car usage to bikes. It has helped many people to buy bicycles but key cohorts of society have been excluded from it including:
 - a) Children;
 - b) Students;
 - c) Unemployed people;
 - d) Self-employed people;
 - e) Stay at home parents;
 - f) Carers;
 - g) People who cannot work due to disability;
 - h) Those in the 'Gig' economy.
 Introducing additional schemes including reducing tax on bicycles purchases (as well as repairs/services) and low cost loans for bike purchases would help ensure that active transport is accessible to all including low-income families.¹³
- Provide safe, secure and well-lit bicycle parking in towns and cities in particular at DART, train, bus stations and all park and ride facilities and in the premises of large companies.

¹² Cyclist.ie. Rural Cycling Collective. Vision for Cycling in Rural Ireland. Available at: https://cyclist.ie/wp-content/uploads/2022/04/vision-for-cycling-in-rural-Ireland-launch-FINAL_updated-180920.pdf

¹³ <https://www.jcfj.ie/2022/05/19/bike-week-making-cycling-affordable/>

6.2 Electrification

1. 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?

- Government and state bodies must be clear that a switch to EVs is not the silver bullet for all our transport problems. We need progressive solutions to get people out of cars. For example in France and Lithuania a scrappage scheme is in place where people can trade in their old car and receive a grant towards the purchase of an e-bike.
- We also support expanding the bike to work scheme to accommodate the likes of e-bikes and cargo bikes as well as second hand bicycles.
- For rural areas, immediately introduce a state-backed interest-free loan for rural households to buy EVs.

4. 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?

- Air quality is a major issue in some urban areas.¹⁴ This impacts those who live in these areas most. This is despite the fact that car ownership in Dublin city centre is the lowest in the country.¹⁵ The commuting pattern of those entering the city for work is consequently causing health problems for those living in the city.
- Immediately implement a daily congestion charge on all private vehicles entering Dublin city centre that escalates by emissions and weight and extend it to other urban areas as more public transport comes on stream. We're mindful that the carrots and sticks shouldn't be applied to rural and urban areas in the same way. For example, car dependency, and therefore increased taxation on cars and fuel, is particularly challenging for rural areas given that rural communities often have few alternatives. Taking this into account, congestion charges are an important measure to focus on urban areas in order to reduce traffic, decrease emissions and air pollution, as well as generate revenue for public transport, cycling and walking. This should start in Dublin in the first instance and charges should be based on car/engine size with the largest cars, particularly SUVs, facing the largest charges.

6.4 Rural Transport

¹⁴ <https://www.independent.ie/news/environment/traffic-fumes-and-open-fires-causing-widespread-air-quality-breaches-42002974.html>

¹⁵

https://www.cso.ie/en/media/csoie/newsevents/documents/census2016summaryresultspart2/Chapter_8_Travel_patterns_and_car_ownership.pdf

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?

- Public transport, active travel and car/bike share schemes need to be a low cost, fast, flexible, hassle free alternative to car dependence.
- Where public transport and active travel are less feasible (i.e. in sparsely populated areas and in areas without public transport options), tailored supports (such as state-backed interest free loans) should be made available for the purchase of EVs and installation of home chargers. The longer distances travelled in rural areas mean a greater need for extensive expansion of the charging network. Without these services being available and reliable, there may be reluctance to make the switch to EVs.

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?

- Construct cycling greenways across the country to connect rural towns and villages to facilitate leisure, tourism and commuting needs, as well as providing more space within town centres for safe cycle lanes and bicycle parking.
- Prioritise safe cycle routes to schools and car free zones at school gates. Increase funding available for routes to school - the school run is one of the main reasons for short car trips. While the €15 million allocated last year was welcome, only 170 schools are covered under Round 1 of the scheme, and although there is a commitment to work with 760 schools on a rolling basis over the coming years this represents just a fraction of the 4000 primary and post primary schools in Ireland.
- Reduce speed limits to make our roads and streets safer and more accessible for everyone, and to reduce casualties. Lower speed limits in built up and in rural areas will promote active travel which in turn will lead to a reduction in emissions. It is not feasible to expect people to walk and cycle on rural roads with a speed limit of 80 km/h. It is absolutely essential to introduce a default 30 km limit in built up areas and around schools as per the Stockholm Declaration.
- Increasing funding for active travel across all levels of Government including expansion of the Active Travel Teams within local authorities.

6.5 Just Transition & Communication

What are the key elements of a just transition in transport? Are there certain cohorts that should be given exemptions / insulated from potential increased costs?

- Ensure that grants and schemes aimed towards helping and encouraging people to purchase bicycles, cargo bikes and e-bicycles are broad enough to include those on lower incomes.
- Good public transport and active transport infrastructure should be prioritised in areas which are more disadvantaged.¹⁶ This would lower transport poverty as well as facilitate a reduction in transport emissions.

Section 7 Agriculture

- a) We support the recommendations noted in the position paper of the Environmental Pillar, the Stop Climate Chaos Coalition, and the Sustainable Water Network (SWAN), Towards a New Agricultural and Food Policy for Ireland Recommendations for Government.¹⁷
- b) We note that Irelands agricultural model is based largely on carbon intensive meat and dairy as a result of persistent policy and marketing positions. Reassessing the role of Bord Bia in marketing and promoting consumption of meat and dairy products will be an important aspect of decarbonising Ireland agricultural emissions.

1. What are the opportunities to increase take-up of measures identified in AgClimatise and encourage adoption of other practices which reduce emissions?

The key to reducing air, water and climate pollution from agriculture is reducing the use of chemical nitrogen fertiliser, which grew 28% after 2010 to 408,000 tonnes a year. It's fallen this year due to the skyrocketing price of the fossil fuels used to make it. The Government must ensure that chemical fertiliser use does not rise again in 2023 or 2024 and falls to 2010 levels no later than 2025, and continues to decline steadily to less than 200,000 tonnes by 2030.

Compensatory measures for farmers should be put in place to incentivise herd reductions and diversification in the beef suckler and finishing sectors. Farmers relying on CAP payments for the bulk of their farm incomes should not be financially worse off by implementing herd reductions on a gradual basis.

Publish a roadmap that brings Ireland into compliance with binding commitments on ammonia. The roadmap should include implementation and enforcement measures, and funding for farm abatement measures. Government should also increase efforts to address barriers to compliance with the NECD, including improved mapping and monitoring.

¹⁶ See <https://www.sciencedirect.com/science/article/pii/S0967070X20309215>

¹⁷ Environmental Pillar, Stop Climate Chaos Coalition and the Sustainable Water Network. Towards a new agricultural and food policy for Ireland: Recommendations for Government. Available at: <https://www.stopclimatechaos.ie/news/2021/04/27/towards-a-new-agricultural-and-food-policy-for-ire/>

Reducing the absolute amount of non-grass feed which is used to feed Irish cattle will automatically in a reduction in cattle numbers as our natural resources currently does not support the numbers of cattle currently farmed in Ireland.

2. What policies and measures would be needed to support farmers diversify their farm activities to include opportunities such as bioenergy, vegetable growth, forestry, organic farming, etc.?

Develop a farmer and community-centred Just Transition action plan for the sector that includes diversification options with environmental co-benefits. We recommend support for the scaling up of local and indigenous nature-friendly food production, especially in cereals and pulses for human consumption, fruit and vegetables – a large proportion of which are currently imported at the expense of the indigenous tillage and horticultural sector.

Diversification strategies should be based on the merits of delivering public goods that deliver landscape and catchment-scale environmental and socio-ecological benefits.

Scale up locally adapted results-based agri-environment payment schemes on all farm types to support farmland biodiversity. Scheme payments must be financially attractive and supported by improved monitoring and evaluation systems for biodiversity actions and outcomes. Schemes should support biodiversity, carbon sequestration and water quality including active rewetting and maintenance of bogs, riparian planting, agroforestry, continuous cover forestry and hedgerow conservation.¹⁸

Establish networks of agricultural innovation that provide an enabling environment for on-farm diversification. Facilitate peer-to-peer learning and knowledge transfer between farmers, government agencies, civil society, and research institutes.

Review the curricula of all agricultural training colleges to ensure that the next generation of farmers have up-to-date skills and knowledge in ecology and climate change.

8. What sort of role could Ireland's marine environment (lakes, seas) have in delivering climate mitigation? What are the building blocks that need to be put in place to support the role of the marine environment in climate mitigation (e.g. a regulatory framework, measurement and accounting rules)?

Ireland is committed to expanding the Marine Protected Area (MPA) Network by 30% and developing 7GW of offshore wind energy by 2030. While both of these initiatives will aid in climate mitigation, there are still several pressures on Ireland's marine environment that need to be addressed. We recommend that the following actions be taken:

- Urgent implementation of Ireland's commitment to achieve 30% marine protected areas by 2030, by targeting the designation of 10% MPAs by 2025. This process should include long-

¹⁸ <https://www.jcfj.ie/article/high-nature-value-farmland-getting-results-from-farming-for-biodiversity/>

term and meaningful engagement with those who rely on the ocean for their livelihoods, in order to select sites that will not negatively impact Irish fishers, and to ensure a just transition. The MPAs should also be established according to sound scientific evidence, be of maximal protection (ie no take zones) and enforced rigorously.

10. What specific measures can be taken in agriculture, forestry and land use to adapt to climate change?

See Oxfam and Trócaire's recent report on Sustainable Food Systems¹⁹ and in particular the following recommendations:

- Recommendation 8: Immediately invest more resources in research on the feasibility and value of regenerative agricultural practices in the Irish context. Place greater emphasis on social innovation alongside technological innovation.
- Recommendation 17: Invest more in fresh, nutritious, and local produce. Increase subsidies for horticultural development to reduce reliance on imported fruit and vegetables.
- Recommendation 18: Invest more in Ireland's food identity. Increase funding for research into Ireland's food history. Create a food subject in schools to educate students on healthy diets and cooking options, the links between agriculture and human and environmental health, as well as to promote domestic approaches to reduce food waste at the household level.

Section 10 Just Transition

We support calls from the newly formed "Just Transition Alliance" of trade unions, environmental and civil society groups²⁰ for the immediate establishment of a national Just Transition Commission to develop an agreed blueprint for the zero-carbon transition, build public support for climate action and ensure that no worker or community is left behind. More specifically, we support their call for the following:

- The Just Transition Commission has yet to be established and legislation has not yet been brought forward. As a matter of urgency, the Government should move to immediately establish a National Just Transition Commission, in advance of formal legislation, based on social dialogue and comprised of representatives of government, trade unions, employers, affected communities and civil society. The Commission would be charged with developing the national framework and blueprint for Just Transition covering the entire economy, in line with the ILO Guidelines for a Just Transition.

¹⁹ Oxfam and Trócaire (2021) Sustainable food systems: steps Ireland can take to become a global leader. Available at: https://trocaire.org/wp-content/uploads/2021/07/Sustainable-Food-Systems_Aug.pdf?type=policy

²⁰ The founding members of the Just Transition Alliance include: the Irish Congress of Trade Unions, SIPTU, Fórsa, Friends of the Earth, Stop Climate Chaos Coalition, and TASC.

- The focus of the Commission will be on job retention, protection of living standards, skills development, the creation of Decent Work in respect of new employment opportunities arising from the transition - particularly in the renewable energy sector - and will underpinned by a commitment to genuine community and regional development
- Act with urgency to ensure that those sectors of the economy and those regions that are most vulnerable to change are prioritised under the Just Transition process
- Commit to the development of a new overarching policy and strategy for the energy sector that ensures the maximum retention of key energy assets in public ownership and a leading, strategic role for the State in the development of the renewable energy
- This process must align with commitments entered into under the United Nations' Sustainable Development Goals (particularly SDG 7) on ensuring "access to affordable, reliable, sustainable" energy for all. To this end, it is critical that energy is officially designated as an 'essential public good' (like health or education) and that there is a guarantee of access to affordable energy as a core policy priority of government.