

[REDACTED]

From: [REDACTED]
Sent: Sunday 18 September 2022 10:52
To: Call For Evidence
Subject: Call for Expert Evidence - Climate Action Plan 2023

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Dear DECC,

I am writing in response to your call for expert evidence on the Climate Action Plan 2023. We are an environmental consultancy actively involved in assisting Irish business to improve their sustainability and reduce their greenhouse gas emissions. Over a ten-year period we have reduced our own energy emissions by 75%, mostly by measures relating to our domestic premises (from which we run our business) and our transport. Our longstanding clients have collectively logged a 60% reduction in their energy emissions over the same period. We and our client base have therefore out-performed the targets which Ireland has committed itself to, noting that over the last ten years Ireland has failed to achieve any meaningful reduction in greenhouse gas emissions.

The following submission is informed by the above-noted experience.

Firstly, we fully endorse the 12-step plan proposed by Friends of the Earth. We will not repeat it here as you will already be familiar with it.

Secondly, it is clear that Ireland is on course to fail on its legally binding commitment to achieve a 51% reduction in overall greenhouse gas emissions by 2030. The Climate Action Plan 2023 needs to recognise this and needs to ensure a that much higher level of ambition is built into the plan; that robust measures are in place to ensure all the sectoral emissions ceilings are achieved; that these plans are realistic; and that effective and timely corrective actions are taken when a plan is seen to be failing.

By way of example, I would like to focus on the plans for electrification of transport. The plan is to have 845,000 passenger electric vehicles on the road by 2030. The focus is to be on battery electric vehicles rather than hybrids, which we agree with. In our view, hybrids should not be included in the target figures at all. On average, approximately 100,000 new cars are bought each year in Ireland. If this target is to be achieved, it would follow that every car sold in Ireland from today onwards would need to be an electric vehicle. There are no realistic measures in place to achieve this. In 2021 only 8% of new cars sold in Ireland were battery electric cars. There were also some plug-in hybrids in similarly small numbers. In the absence of a realistic implementation plan this part of the Climate Plan was doomed to failure from the outset and radical measures are now needed if it is to be recovered. Such as an immediate outright ban on new fossil fuelled vehicles. If such action is not taken, alternative equivalent greenhouse gas reduction measures need to be added elsewhere in the Climate Action Plan to compensate for this failure.

I would also note that incentives to purchase electric vehicles are being prematurely removed. The zero-BIK incentive for company cars is being rapidly withdrawn, commencing 2023, and this is counter-productive. Here is a practical example. We have a client who was considering changing their existing company cars to electric alternatives. As a result of the withdrawal of zero-BIK, they have abandoned that idea and will stick with their existing vehicles of choice. These are large diesel-powered crewcab SUVs, which attract zero-BIK. The client has absolutely no requirement for all-wheel drive vehicles, or crew cabs. They are purely influenced by the tax incentive to run this type of high-emissions vehicle. If zero-BIK is to be removed from electric vehicles, at the very least it should also be removed from all other vehicles.

Thirdly, the supports and incentives available to SMEs for reducing their emissions need to be completely overhauled. There are some useful supports in place, notably the renewable heat incentive, the SEAI Support

Scheme for Energy Audits and the Local Enterprise Office Green for Micro scheme. The Enterprise Ireland GreenStart scheme is very good, but it is only available to a very small cohort of exporting and high-growth potential businesses. It, or an equivalent, should be made available to all Irish SMEs.

The SEAI Communities grant scheme needs to be completely redesigned or replaced. In its existing form it is very difficult to access, onerous to engage with and prone to unflagged rule changes which result in wasted time and effort pursuing grants which are no longer be available. We have engaged with this scheme every year for the last ten years and we have seen it become increasingly unwieldy each year. Now some SEAI-Registered Sustainable Energy Communities (for which it is designed) are completely excluded from participation.

We know from our own experience that supports for SMEs, if they are to be effective, need to run over the medium-term. Single interventions such as training or audits tend to be ineffective. If public money is to be spent supporting the business sector, there needs to be in place a means of measuring the effectiveness of the intervention, i.e. actual measured improvement rather than potential for improvement. A broader approach along the lines of the CARE programme delivering measurable results and available to the entire Irish SME sector should be developed and implemented.

Government should also make use of its considerable purchasing power to accelerate progress in the business sector. No commercial business should receive contracts or grants of any type from government agencies unless they can demonstrate they have in place an effective environmental improvement and greenhouse gas reduction programme.


Yours sincerely,



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