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**Re: Public Consultation on the Department of the Environment, Climate and Communications
Research and Innovation Strategy**

Dear [REDACTED]

The Environmental Protection Agency (EPA) welcomes the development of the Department of the Environment, Climate and Communication's inaugural Research and Innovation Strategy (the Strategy). The enhanced focus on research and strengthened recognition of its key role as an enabler of the Department's strategic goals is to be welcomed.

The EPA has been funding environmental research in Ireland since 1994 with a focus on generating knowledge and evidence to support effective environmental policy development, implementation and broader decision-making. Our latest ten-year research framework *EPA Research 2030* sets out our ambition to put science and innovation at the centre of environmental protection in Ireland through the development and proactive transfer of knowledge.

We welcome the opportunity to input to the development of the Strategy, both through this consultation process as well as our ongoing engagement with your Research and Innovation External Advisory Group.

Strategy Vision & Objectives

The vision of the new Strategy, as it pertains to environmental and climate research, should be to enable an environmentally sustainable Ireland. Sustainability should be the guiding principle for action, and public research investments should be viewed through the lens of sustainability to enable Ireland to become a resource-efficient climate neutral economy, founded on a fair and just society which fully respects the ecological limitations and capacity of our natural environment. In



this context, it is important to ensure that the Strategy's focus is not solely on climate and that other key areas of environmental research such as the circular economy, natural environment and environment and health are also adequately addressed in the Strategy, including cross-sectoral and cross-cutting environmental topics.

The EPA publishes State of the Environment Reports on a four-yearly cycle, providing an assessment of the overall quality of Ireland's environment, the pressures being placed on it and the societal responses to current and emerging environmental issues. The key messages from the most recent report may be useful in framing the Strategy. Preparation of the State of the Environment Report 2024 is currently underway will be valuable in informing subsequent reviews and updates of the Strategy.

We welcome and support the objectives outlined in the strategy consultation document, and note in particular the objectives around: 'Establishing key objectives in relation to research and innovation, including priorities, in the short, medium and long-term'; 'Establishing strategic research and innovation gaps as informed by public policy and seeking to address these'; and 'Clarifying the role of the Department and its Agencies in the achievement of research and innovation objectives'. The new Strategy provides a valuable opportunity to provide greater clarity and cohesion around research objectives, priorities, gaps and roles. We provide further comments on this below under the headings of Coordination and Governance.

We also support the inclusion of the objective on 'Providing for multi-annual funding for research, where appropriate'. The EPA currently receives our research budget on an annual basis, which limits the timeframe within which we can run our research calls. The provision of multi-annual research budgets would significantly enhance flexibility around the timing, size and scope of calls, which would offer significant benefits both for the EPA and the research community. Currently, most funders work to an annual funding cycle, leading to a concentration of research calls earlier in the year. This limits the capacity of the research community to respond. A multi-annual funding model would allow for better coordination between funders and potentially allow for improved scheduling of research calls to maximise engagement with the research community.

Research coordination

In addition to our role as a research funder, the EPA has a statutory role in coordinating environmental research in Ireland. This is currently delivered through the National Environmental Research Coordination Group and the Climate Research Coordination Group. A key objective of these groups is to bring together research funders and others to share information and improve the co-ordination and coherence of environmental and climate change research in Ireland, as well as promote effective linking of these to European Union funding streams.

We are currently reviewing the remit, membership and operations of the NERCG and CRCG to ensure that they remain effective and have the optimal set up to support a cross-sectoral approach to research to address environmental and climate research issues. The new Strategy should act as an enabler of the EPA's coordination activities and seek to utilise the expertise and outputs of existing fora, including similar coordination groups that address research in the areas of energy and the marine environment.

Research governance

We emphasise the unique added value brought by individual research funders such as the EPA in informing evidence-based decision-making. In particular, the EPA's deep understanding of the complex and inter-related environmental challenges facing Ireland, derived from our regulatory, advocacy and knowledge provider roles, places us in a strong position to continue to support the research-policy interface at EU and national level. There cannot be a single voice and a one-size-fits all approach in the development of research of such scale and importance. If climate and environmental issues are to be truly integrated, they should be considered in the activities of the various bodies, with all providing different aspects and expertise (i.e., science, policy and opportunity/implementation) to solving the challenges facing Ireland.

However, this approach to funding research requires leadership, coherence and alignment which is currently missing. The research and innovation priorities of individual funding agencies are currently focused on achieving their own strategic objectives, and investment is accordingly prioritised in these areas. Co-funding arrangements are employed between funding organisations, recognising the relevance of research beyond its primary funder, but design of joint research initiatives is less common as things stand. This poses a risk of overlooking research priorities that may span or fall between the remit of individual funders.

With the growth and increased investment in climate-related research in Ireland, we advocate that high-level strategic leadership – that works across relevant government departments and research funding agencies – is required to improve the coherence of publicly funded climate research. This is needed to ensure that key policy-relevant research priorities are identified and that gaps or duplication are avoided.

The Strategy provides a valuable opportunity to identify and seek to address the need for new strategic leadership structures to maximise the contribution of R&I to climate action and to optimise the wider co-benefits of climate action for the environment and society more widely. The EPA is happy to work with the DECC, and others, in developing these structures given our existing roles in coordinating environmental research. In addition, the EPA-led research coordination groups, currently under review, could contribute to these new structures at the appropriate level.

In addition, since current research budgets are typically earmarked to address the priorities of a specific funder, consideration should be given by DECC to the provision of additional funding to enable truly cross-cutting programmes of research.

Research priorities & gaps

The EPA undertakes a three-yearly thematic assessment to provide the strategic direction for its research programme, as well as annual consultation with key stakeholders to identify specific research needs. These mechanisms support the selection of projects that provide timely evidence to inform the development and implementation of policy in areas relevant to the work of the EPA and DECC. However, to address complex and systemic issues, more holistic approaches are needed that may go beyond the research priorities of a single funding organisation. The Department, through its leadership role, outlined above, could provide strategic direction in identifying priority areas for investment.

Evidence for policy and knowledge transfer

It is clear that knowledge generation and evidence for public policy are critically important in tackling environmental challenges. We welcome the strong recognition of policy-informing research throughout the strategy consultation document. In finalising the Strategy, we advocate that research for policy be placed on an equal footing alongside research for knowledge and research supporting jobs/growth in the Strategy and in its implementation.

In October 2022, the EPA convened a seminar on Environmental Science to Policy, which was an important inaugural event bringing together policymakers, knowledge transfer practitioners and scientists from across the Irish Government and academic systems to consider the question of how best to deliver environmental knowledge effectively to the policymaking process. The reflections paper¹ published after the event includes a number of recommendations that should be considered in finalising the Strategy:

- Leadership is needed to build out a strong framework within which national environmental research and science activities can be better mobilised and aligned in support of national policy, joining- and scaling-up existing and future strategies.
- Practical and proactive ways must be developed to move from individual relationships between policymakers and scientists to a system based on institutional trust which values and supports long term, sustainable policymaking and implementation.
- There is a need to strengthen multi-stakeholder approaches to support policy development, finding new and innovative ways for policymakers and scientists to work together in support of policy objectives and a greater focus on *ex post* evaluation.

Knowledge co-production and effective knowledge transfer require an inclusive and proactive approach that must be embedded in the culture of research funders, research performers and research users. DECC, through its role as a member of the Impact 2030 Steering Group and the Civil Service Research Network, for example, can advocate for the need to build capacity, practice and structures in these areas to drive more efficient transfer of knowledge from science to policy.

Research investment and funding

As set out in Impact 2030, investment in research and development is a major driver of innovation and can bolster economic growth and competitiveness. We advocate that Ireland should strive to meet or exceed the EU average for R&D intensity. The Strategy should link the requirement for a growing research budget to the ultimate objective of achieving and maintaining an environmentally sustainable Ireland, and seek to ensure that there is a protected, sustained and growing national budget for environmental research in Ireland. As outlined above, we also strongly support the Strategy objective to provide for multi-annual funding for research, where appropriate. This would offer significant benefits both for Research Funding Organisations to have additional flexibility in the scheduling of calls, which would in turn support the research community to maximise its

¹ <https://www.epa.ie/publications/research/communicating-research/epa-environmental-science-to-policy-seminar-2022---seminar-reflections-paper.php>



engagement with the funding system and to deliver positive impacts for the environment, climate and sustainability.

We are happy to discuss any of the points raised in this submission in more detail and welcome the opportunity to contribute further as the Strategy is developed.

Yours sincerely

[Redacted signature]

[Redacted name]

[Redacted title]

