

ECOLOGICAL CONSULTANT

National Adaptation Framework Public Consultation

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Response: It is submitted that the key priority of rapid decarbonisation of energy use in all sectors of the Irish economy has not been adequately described and considered in the Draft National Adaptation Framework. The overarching goal of the Paris Agreement (adopted during COP21 in 2015) is to hold “the increase in the global average temperature to well below 2°C above pre-industrial levels” and pursue efforts “to limit the temperature increase to 1.5°C above pre-industrial levels” by the end of this century¹.

2023 is confirmed as the warmest calendar year in global temperature data records going back to 1850². The 12-month period ending in January 2024 has exceeded 1.5°C above the pre-industrial level. *Taking into account the average of the last twelve months (February 2023 to January 2024), the global mean temperature was the highest on record at 0.64°C above the 1991-2020 average and 1.52°C above the 1850-1900 pre-industrial average*³.

Rapid reductions in greenhouse gas (GHG) emissions are increasingly required under legally binding international agreements, EU and National legislation. The potential for zero carbon renewable (green) hydrogen to replace fossil and other greenhouse gas emitting fuels, to assist in meeting increasingly onerous 2030 and 2040 climate targets, is not referred to in the Draft National Adaptation Framework. The National Hydrogen Strategy, published in July 2023⁴, includes a list of 21 actions, many of which are relevant to both Climate Change Mitigation and Adaptation. It would be useful to provide cross-referencing to these actions in the final draft of the National Adaptation Framework, and to further consider policy coherence and additional ways of accelerating the implementation and ambition of actions identified in the National Hydrogen Strategy.

Most countries that are currently developing renewable hydrogen economies have started by supporting the use of hydrogen and fuel cells in transport and mobility, providing an early end use for renewable hydrogen, building demand, developing familiarity with hydrogen as a zero carbon fuel, and providing choice to both public service, commercial and private vehicle fleet operators and users⁵. It is important that holistic, plan-led GHG emission reduction and decarbonisation policies facilitate and support Equality, Diversity and Inclusion (EDI) in all sectors of the economy.

¹ [The Paris Agreement | UNFCCC](#)

² <https://climate.copernicus.eu/copernicus-2023-hottest-year-record>

³ <https://climate.copernicus.eu/warmest-january-record-12-month-average-over-15degc-above-preindustrial>

⁴ <https://www.gov.ie/en/publication/624ab-national-hydrogen-strategy/>

⁵ [Hydrogen Fuel Cell Electric Vehicles | European Hydrogen Observatory \(europa.eu\)](#)

In this context, policy planning for both onshore and offshore renewable energy projects that facilitate and provide equal access to decarbonising fuels and technologies including green hydrogen across all sectors of the economy, including decarbonisation supports to the communities that host renewable energy installations (wind, solar, electrolyser), should be encouraged by policy coherence measures.

Energy efficiency, renewable energy and cleaner energy are referred to in many policy documents including the Draft National Adaptation Framework. It would be useful to include consideration of the role of Green Hydrogen as a vector in the “least burden and most opportunity pathways to decarbonisation.” An objective of the Climate Action Plan (2021) is “We must ensure we bring people with us and that the transition is fair. The National Dialogue on Climate Action will give everyone in society the opportunity to play their part. We will engage with people, ensuring that they are empowered to take the actions needed”.

The availability and use of renewable hydrogen as a zero carbon fuel in all sectors of the Irish economy will also support our energy resilience, including improving resilience during storms and other extreme weather events when electricity transmission and distribution networks are at risk of damage. In January 2024, power outages of several days’ duration affected tens of thousands of households, public utilities, and businesses. The inclusion of policy support in the National Adaptation Framework for the use of zero carbon renewable hydrogen, as well as renewable electricity, in industry, transport, public and commercial services and buildings, residential buildings and in agriculture would help to provide consumer choice of the most appropriate zero carbon fuel, and provide more resilient routes to decarbonisation.