

# **National Climate Action Plan 2023 (CAP23) Part 2**

## **Changing the Public Sector Landscape**

**by Ciarán Hayes**

### **1. Introduction**

Part 1 of this briefing set out the context and provided an analysis of CAP 23 policies and requirements in a number of important areas. They included Carbon Budgets & Pricing, Governance, Monitoring & Measurement, Electricity, Circular Economy & the Waste Sector, and Built Environment.

Part 2 continues the analysis and concludes with comment and discussion on the broader CAP 23 issues, challenges and opportunities facing the wider public sector and more specifically, the Local Government sector.

#### **2.1. LULUCF & Parks, Open Space, Recreation & Amenity**

Ireland is something of an EU outlier when it comes to Land Use, Land Use Change and Forestry (LULUCF). From 1990 to 2021, the Irish LULUCF sector has been a net emitter of GHGs in contrast to the EU-27, which has been a net sink. Following the publication of the Climate Action Plan 2021 and the EPA's National Inventory Report 2021, the understanding of GHG emissions associated with the sector has changed. It is now known that planting trees on peaty or organic soils generates greater emissions than previously thought. The LULUCF sector has consequently witnessed a significant revision in the 2018 baseline data and now represents a greater share of the total economy-wide emissions and substantially increases the gap to targets.

It is proposed to increase Ireland's annual afforestation rates from approx. 2,000 hectares per annum in 2021 and 2022 to 8,000 ha per annum from 2023. The proposal seeks to deliver an additional 28,000 ha of afforestation across the first carbon budget period, a proposal that's likely to cause challenges for the Agricultural sector.

Additional proposals provide for the promotion of forest management initiatives in both public and private forests to increase carbon sinks and stores; improvement and management of carbon sequestration of 200,000 ha of grasslands on mineral soils; reduction in the management intensity of grasslands on 25,000 ha of drained organic soils; and rehabilitation of 33,000 ha of peatlands as part of Bord na Móna's Enhanced Decommissioning, Rehabilitation and Restoration Scheme (EDRRS) and LIFE People and Peatlands programmes.

Under CAP 23, DECC, DAFM and DHLGH are lead agencies for the publication and commencement of a Land Use Review (actions LU/23/19 and 20). Although not specifically identified as a stakeholder, the extent of parks, open space and other Local Government landholdings would indicate Local Government sectoral involvement.

Emerging EU legislation will further influence and inform the sector's LULUCF role. The proposed EU Nature Restoration Law seeks to repair European habitats that are in poor condition and bring back nature to all ecosystems. The aim is for nature restoration measures to apply to a proportion of the EU's land and sea areas by 2030 and to eventually extend these measures to all ecosystems in need of restoration by 2050. The national implementation of the proposed EU Nature Restoration Law will be led by the Department of Housing, Local Government and Heritage on the basis of a whole-of-Government approach.

Peatland rehabilitation will also impact the Local Government sector. Peatlands cover 21% of Ireland's total land area and 64% of our total soil organic carbon stock. In addition to the Bord na Móna EDRRS scheme and LIFE project proposals, it is proposed to incentivise an increase to the area of afforestation by 68,000 ha, restore/rewet raised bog Special Areas of Conservation and Natural Heritage Areas, halt and reduce peat oxidation and carbon loss and conduct further research to assess the potential to sequester, store and reduce emissions of carbon through the management, restoration and rehabilitation of peatlands as outlined in the National Peatlands Strategy.

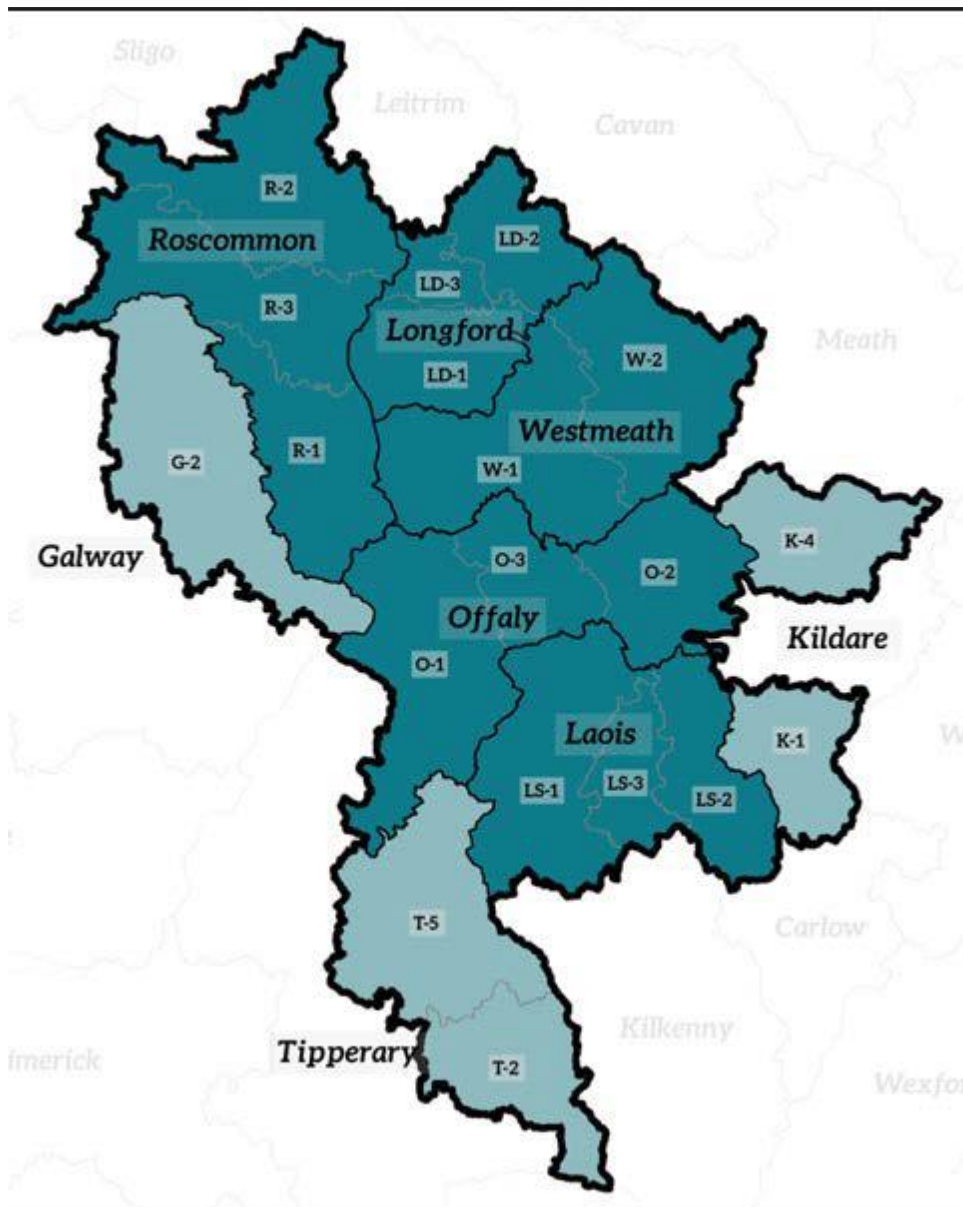
## **2.2 Just Transition**

Climate change is giving rise to job displacement, an issue manifesting itself clearly in the midlands with the cessation of turf harvesting and closure of peat fired power stations. CAP 23 addresses the issues under two chapters and brought forward four principles from the Just Transition Framework established under the 2021 Climate Action Plan into CAP23. They are:

1. An integrated, structured, and evidence-based approach to identify and plan our response to just transition requirements.
2. People are equipped with the right skills to be able to participate in and benefit from the future net zero economy.
3. Costs are shared so that the impact is equitable and existing inequalities are not exacerbated, and
4. Social dialogue to ensure impacted citizens and communities are empowered and are core to the transition process.

A Just Transition Commission is to be established to provide advice to Government and the education sector is positioning itself to provide training and upskilling both to staff displaced by climate change and future generations to ensure availability of necessary skillsets for a carbon neutral economy. A November 2021 report of the Expert Group on Future Skills Needs (EGFSN) on Skills for Zero Carbon estimated a demand for 5,000 roles in these activities in 2020 rising to a potential 22,000 – 27,000 roles by 2030.

Local Authorities, particularly those in the midlands EU JTF territory (see Figure 2 below), are playing a role in the identification of job creation opportunities, provision of support to start-up enterprises and remediation of peatlands. Authorities in the EU JTF territory must take account of the Just Transition Implementation Plan for the Midlands Region for which substantial Exchequer investment has been mobilised to date to support local communities and enterprises in the region.



**Figure 2. Proposed EU JTF Territory.**

It is noted that each relevant Minister will report to the Oireachtas on how the principles for a just transition are being addressed under CAP 23, including the policies, mitigation measures and adaptation measures for each sector. All LA CAPs are to incorporate the four just transition principles. For those within the EU JTF territory, the expected outcome is the strengthened resilience of the regional economy of the Midlands in line with national climate objectives.

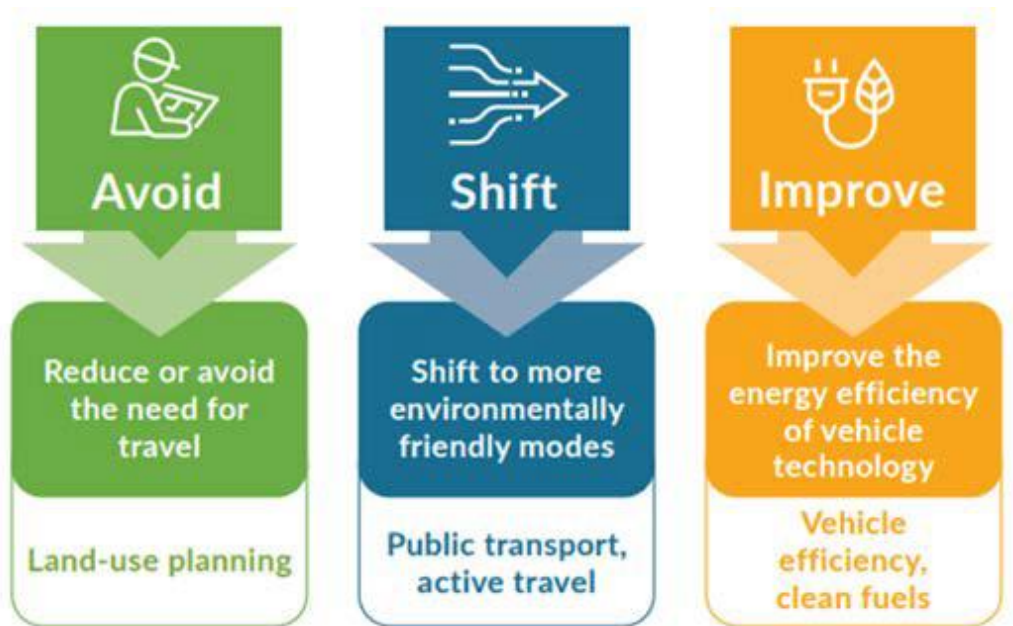
### **2.3. Transportation**

Transport is the second largest CO<sub>2</sub> emitting sector and faces major challenges in meeting its stringent carbon budget ceilings. CAP 23 acknowledges the transformational change and

accelerated action required across all key decarbonisation channels for the 2030 transport abatement targets to be achieved. The transformational change required is recognised by the Government as unprecedented. Five key principles are embedded across all Transportation measures encompassing 77 specific actions of which Local Government has been identified as a Stakeholder in 37. Of the key principles, Local Government particularly should note the fifth:

1. Systems Innovation
2. Just Transition
3. Accelerated implementation
4. Communication and citizen engagement, and
5. Enhanced governance, particularly at Local Authority level.

Further impacts on the sector will come from the Department of Transport's National Sustainable Mobility Policy and from Action TR/23/25 (TF), which is the sole action within CAP 23 where Local Authorities are identified as the Lead. An 'Avoid-Shift-Improve' framework (see Figure 3 below) for transport sustainability is introduced in recognition of the OECD report's findings that the Irish transport system embeds car dependency and increased emissions by design.



**Figure 3. Avoid-Shift-Improve framework.**

An examination of CAP 23 Transportation actions indicates the range and extent of the challenge in meeting the carbon ceiling targets:

- Enable the transition of a significant part of the vehicle fleet to electric
- Regulate for higher biofuel blends in existing technologies as a vital transitional measure
- Drive implementation and acceleration of identified measures to reduce car kilometres, guided by the SMP action plan and a new National Demand Management Strategy
- Communicate and demonstrate the well-being and co-benefits that accompany enhanced place-making and sustainable transport behaviour
- Expand the number of safe, accessible, walking and cycling routes, including through the provision of 500 Safe Routes to School schemes and the rollout of over 1,000 kilometres in active travel infrastructure
- Work with key stakeholders to implement the National Planning Framework (NPF), focusing on improving placemaking and accessibility
- Enhance the integration of sustainable transport considerations into the spatial planning system;
- Improve air quality, particularly through the transition of our vehicle fleets along with reduced car dependency.

## 2.4. Agriculture

Agriculture is by far the largest emitting sector and faces some of the greatest challenges. It accounted for 33.33% of Ireland's greenhouse gas (GHG) emissions in 2021, down from 34% in 2020.

*'Emissions from this sector since 1990 have ranged from 20.07 MtCO<sub>2</sub>eq. in 1990 to a historical peak of 22.93 MtCO<sub>2</sub>eq. in 1998 and a low of 19.36 MtCO<sub>2</sub>eq. in 2011. Following the abolition of milk quotas, emissions have risen to a point short of the previous peak, to 23.09 MtCO<sub>2</sub>eq. in 2021. Overall emissions in this sector have grown 19% over last decade.'*<sup>1</sup>

Impacts on Local Government from the Agricultural climate challenges are minimal due to limited interaction between the sectors. However, opportunities exist for collaboration, particularly in respect of anaerobic digestion (AD). Chapter 16, Paragraph 16.3.3 addresses the AD diversification option:

*'AD and the production of biomethane is at a nascent stage of development in Ireland, although it is extensively developed elsewhere in the EU, with Germany having over 200 plants. There is a need for an all-of-Government approach to deliver on this ambition. This will require a multiplicity of stakeholders across Government, farmers, businesses, and regulators to come together and align policy, incentives, regulation, and markets to ensure that the agriculture sector can deliver on its sectoral emissions reduction target; businesses can decarbonise their processes; and Ireland can meet its renewable heat targets for 2030.'*<sup>2</sup>

## 2.5. Adaptation

Global surface temperature is projected to reach or exceed 1.5°C of warming over the next 20-years and will continue to increase until at least mid-century under all emission scenarios considered. Further, global warming of 1.5°C and 2°C will be exceeded this century unless deep reductions in CO<sub>2</sub> and other GHG emissions occur in the coming decades. Certain

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<sup>1</sup> Climate Action Plan 2023, Chapter 16, Agriculture, Paragraph 16.1.1 Emissions Profile to Date

<sup>2</sup> Climate Action Plan, 2023, Chapter 16, Agriculture, Paragraph 16.3.3

impacts of climate change are locked-in, and the formulation of the LA CAPs is critical to the development of climate resilience.

Local Authorities are now required to prepare an updated Climate Action Plan (LA CAP) by April '24 and as outlined earlier, the LA CAP will differ from the 2019 version as it is to cover mitigation, adaptation, and citizen engagement. Citizen Engagement is dealt with separately in CAP 23 but what's notable in the relevant Annex of Actions section is that the Local Government sector has been assigned a minimalist role as one of the identified stakeholders. In contrast, citizen engagement is afforded a prominent role in the context of the LA CAP process. The sector should consider how it minimises duplication and adds value to the wider Citizen Engagement process.

CAP 23 recognises the 'critical' role of Local Authorities in building climate resilience and acknowledges the contribution and success of the Climate Action Regional Offices (CAROs) in supporting the preparation of Local Adaptation Strategies in all 31 Local Authorities. They have been centrally involved in the formulation of Local Authority Climate Action Plan Guidelines, which were launched by Government in March '23. When read in tandem with the Climate Action Amendment Act 2021, CAP 23 and the CAP 23 Annex of Actions, the Guidelines provide a comprehensive roadmap for the formulation and adoption of the ambitious LA CAPs required to meet the climate challenges.

Adherence to the key principles of the guidelines will ensure LA CAPs are not only consistent, but Ambitious, Action-focused, Evidence-based, Participative and Transparent. Each plan will drive the adaptation and mitigation measures required at local level, and define the clear pathway for each local authority to:

- Actively translate national climate policy to local circumstances with the prioritisation and acceleration of evidence-based measures,
- Assist in the delivery of the climate neutrality objective at local and community levels.



- Identify and deliver a Decarbonising Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation, adaptation, and biodiversity measures in a specifically defined area through the identification of projects and outcomes that will assist in the delivery of the National Climate Objective.

### **3. Discussion & Comment**

The Climate Action Plan 2023 is a very comprehensive, ambitious, and significant policy document that challenges the entire public sector to assume a leadership role for the achievement of difficult and stretched carbon emission targets. Contained within it is a governance architecture that retains an oversight and monitoring mechanism at the highest level and provides for individual sectors to bear any EU compliance costs for failure to achieve the sectoral targets. Perhaps because of its ambition and comprehensive nature, policy, operational and coordination gaps remain, particularly for the Local Government sector.

That Local Government is not identified prominently in the Annex of Actions as a Lead or Stakeholder should not be taken as a reduction or easing in its sectoral obligations. Rather, Government Departments tasked with leading many of the actions will rely on multiple agencies including Local Authorities to deliver on the actions on their behalf at local level. It can therefore be assumed that the sector's obligations will extend well beyond the actions for which they have been identified as a Lead or Stakeholder. On that basis, the sector will need to have particular regard to the oversight and monitoring mechanism mentioned above.

The most immediate climate change risks to Ireland relate to changes in extremes such as floods, droughts, and storms, all of which need to be captured in the LA CAPs. With regard to sea level rise, the World Meteorological Organisation's State of Climate Report 2021 indicates global sea levels rose an average of 4.5mm per year over the period 2013 to 2021. When cross-referenced with the CAP 23 Annex of Actions however, action AD/23/6 is the only action dealing with coastal change management and that relates to the finalisation of a scoping report. Led jointly by DHLGH and OPW, stakeholders are identified as Other Departments

required to input into the report. Local Authorities are not identified despite being one of the agencies most immediately impacted.

2,400 Local Authority housing units are to be retrofitted to a minimum BER B2 standard this year, but the sector is not identified as a Stakeholder. Nor is it clear how the target will be achieved particularly in the context of other urgent housing priorities and the Ukrainian refugee crisis.

Operating largely on the basis of tradition, custom and practice, the climate challenges for Local Government are relatively new and generate a requirement for staff with skillsets not previously sought or available within the sector. A significant training, upskilling and recruitment process is required at a time when the sector is having difficulty recruiting staff, not to mention the approval process required in advance and securing the resources necessary to pay for the staff.

With regard to coordination and consultation, each Government Department is to establish a Climate Delivery Taskforce representative of relevant Stakeholders. While not stated, it is presumed the Local Government sector will be invited to send a representative. However, each of the 31 Local Authorities is also required to consult with all relevant Government Departments regarding the formulation of their own LA CAP. Ensuring contact is made at the appropriate level and coordination of the multiplicity of contact points will be a challenge in itself.

Clarity is required regarding Citizen Engagement. If Local Authorities are required to address citizen engagement as part of the LA CAP process, perhaps they should incorporate the NDCA objectives into the same process. Otherwise, citizens will be inundated with differing local and national agencies advancing differing consultation processes on the same subject. There may be scope for partnership with other agencies that will achieve the same aim.

The scale and ambition of CAP 23 presents major communication issues both internally within the public sector and externally with citizens and the private sector if the required behavioural change is to be achieved and targets reached. Coordination among all public sector agencies

will be required to ensure consistency of the message, provision of accurate and timely information and management of expectations.

For all that, CAP 23 has much to recommend it. It opens up opportunities for the Local Government sector to collaborate with other public sector agencies and the private sector, engage in innovative and sustainable initiatives, address Just Transition issues, advance sustainable economic development and job creation opportunities, and develop the circular economy. The sector demonstrated climate action leadership when establishing the CARO network. CAP 23 presents the opportunity to build on that leadership role and make a positive contribution to the wider climate agenda.