



Robert Emmet CDP

Robert Emmet CDP (RECDP) is a community development project that delivers a series of charitable programmes and strategic projects to the community of South West Inner City Dublin.

RECDP was established in 2003 and recently entered into a voluntary merger process with community development association SICCD- expected to be completed in 2024 at which point both organisations will become 'The Liberties Community Project'.

This submission is based off a template provided by colleague organisation Community Lawa and Mediation (CLM).

Introduction

Despite being among the smallest countries in the European Union, Ireland ranks second highest in emissions per capita. While the EU as a whole experienced a 5.3% reduction in emissions in the second quarter of 2023, Ireland saw an alarming increase of 3.6% during the same period.¹ The Sustainable Energy Authority of Ireland warned in December 2023 that Ireland's emissions are not decreasing rapidly enough to stay within the confines of the 2025 and 2030 carbon budgets.² The Environmental Protection Agency (EPA) further cautioned that even if the Climate Action Plan 2023 had been fully implemented, it would have surpassed the first two legally binding carbon budgets (spanning from 2021-2025 and 2026-2030) by a significant margin of 22%.³ The Climate Action Plan 2023 fell short in implementation, with a third of its proposed measures left unaddressed, according to the

¹ Eurostat (2023) *Statistics Explained: Quarterly greenhouse gas emissions in the EU*. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Quarterly_greenhouse_gas_emissions_in_the_EU (Accessed: 25 March 2024). https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Quarterly_greenhouse_gas_emissions_in_the_EU

² Sustainable Energy Authority of Ireland. 2023. *Energy in Ireland*. Available at: <https://www.seai.ie/data-and-insights/seai-statistics/key-publications/energy-in-ireland/>

³ Environmental Protection Agency. 2023. *Ireland's Greenhouse Gas Emissions Projections*. Available at: https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2022-2040_Finalv2.pdf

Department of Environment, Climate and Communications.⁴ Notwithstanding this shortfall, the Climate Action Plan 2024 fails to outline strategies for compensating for these implementation gaps or ensuring compliance with Carbon Budget 1.

Furthermore, it is unclear why a second consultation on the CAP24 is being held. With the consultation period set to end on April 5th, Ireland may remain without a finalised Climate Action Plan for an extended period, ultimately hindering progress towards emissions reduction targets. This lack of clarity not only hampers the government's ability to deliver a fair and timely transition, but also potentially undermines meaningful public participation in shaping climate policies. Additionally, the delay in accessing relevant data, including the forthcoming EPA analysis of CAP24, further hinders the effectiveness of the consultation process.

The need for a second consultation on the Climate Action Plan 2024.

- The initial consultation for CAP24 took place in summer 2023, facilitated through the [Climate Conversations](#) and the [Call for Expert Evidence](#). However, it remains unclear why a subsequent public consultation is underway after the publication of the Plan. The consultation webpage lacks an explanation for the need for a secondary consultation period or the specific insights the government seeks to gather from the public beyond the responses already obtained. While public engagement in environmental decision-making is integral to environmental democracy, CLM is troubled by the prospect that CAP24 will remain in draft form during the consultation period until the Plan is finalised and formally adopted by the government. With the consultation period ending on April 5th, this delay means that Ireland may go four to five months into the year without a finalised CAP.
- CAP is subject to annual updates, prompting questions about the possibility of a follow-up consultation for CAP25 this summer. Participating in consultations often requires time, effort, and resources. If people perceive that their contributions are not being valued or leading to tangible results, they may be less inclined to engage in future consultations. A lack of transparency regarding the purpose or outcomes of consultations may lead to questions concerning the legitimacy of the process and people becoming disillusioned. Continuous consultations without visible progress may hinder effective climate action by diminishing public trust and engagement in the process.
- A subsequent consultation raises particular concerns, particularly in light of the notable delays in implementing past Climate Action Plans. As per the Government's progress report on CAP23, 35% of the proposed actions were left unaccomplished. Similarly, CAP21 saw 21% of its measures going unimplemented, while CAP19 had 22% of its outlined actions left undone.⁵
- The Environmental Protection Agency's (EPA) analysis of CAP24 is set to be published later this year. A comprehensive assessment of CAP24's effectiveness will only be feasible once the EPA's analysis has been released, a timeline that extends

⁴ Department of Environment, Climate and Communications. 2024. *Climate Action Plan Progress Reports*. Available at: <https://www.gov.ie/en/publication/55fde-climate-action-important-publications/#climate-action-plan-2023>

⁵ Department of Environment, Climate and Communications. 2024. *Climate Action Plan Progress Reports*. Available at: <https://www.gov.ie/en/publication/55fde-climate-action-important-publications/#climate-action-plan-2023>

beyond the conclusion of the ongoing consultation. The public are being consulted on a Climate Action Plan without access to data necessary to enable meaningful participation.

Transparency & Implementation

- According to the Environmental Protection Agency (EPA), current climate mitigation policies and actions are insufficient, with Ireland “not presently on track” to meet its statutory greenhouse gas emission reduction targets.⁶ Under the Climate Act 2021, Ireland's first two carbon budgets (spanning from 2021 to 2030) are projected to be exceeded by a significant margin, ranging between 24% (117MtCO₂-eq) and 34% (170MtCO₂-eq). Estimates for greenhouse gas emissions in 2021 and 2022 indicate that 47% of Ireland's 2021-2025 carbon budget has been exhausted within just 40% of the budget's designated timeframe (2 years out of the 5-year period).⁷ Any shortfall in the first carbon budget will carry over to the second carbon budget period.
- The implementation of Ireland's carbon budget program also introduced Sectoral Emissions Ceilings, setting limits on greenhouse gas emissions permitted by each sector of the economy within the carbon budget timeframe. However, the inclusion of "unallocated emissions reductions" within these ceilings contradicts the Climate Act, which mandates that sectoral ceilings be set "within the limits of the carbon budget" for each period.⁸ Furthermore, the adoption of a sectoral ceiling for the Land Use, Land Use Change, and Forestry (LULUCF) sector for the 2021-2025 period was deferred until 2024, three years into the first carbon budget period. Finally, while emissions in the aviation and shipping sectors are clearly included within the scope of the Paris Agreement⁹ and the Climate Action and Low Carbon Development (Amendment) Act 2021, they are omitted from the Sectoral Emissions Ceilings and first two carbon budgets.
- Despite these issues, the Climate Action Plan 2024 lacks a clear strategy to close Ireland's emissions gap to meet the 2021-2025 carbon budget. As noted within CAP24, the EPA's projections suggest that all the unmodeled measures and unallocated emissions savings in CAP23 would deliver a **42% reduction in emissions by 2030, a “significant residual gap” falling 9% short of the 2030 target**. Without quantified measures within CAP24 to close the emissions gap, Ireland risks falling even further behind its emissions reduction targets. The lack of specificity undermines the government's capacity to facilitate a just and prompt transition while also obstructing the public's understanding of its plans to achieve this goal. As noted by CLM in its submission to the initial CAP24 consultation in 2023, the Supreme Court's ruling in Climate Case Ireland emphasizes the necessity for

⁶ Thorne, P. et al. 2024. *Ireland's Climate Change Assessment - Synthesis Report*. Environmental Protection Agency. Available at: https://www.epa.ie/publications/monitoring--assessment/climate-change/ICCA_Synthesis_Report.pdf

⁷ Thorne, P. et al. 2024. *Ireland's Climate Change Assessment - Synthesis Report*. Environmental Protection Agency. Available at: https://www.epa.ie/publications/monitoring--assessment/climate-change/ICCA_Synthesis_Report.pdf

⁸ McMullin, B., Jackson, A., Sweeney, J., Price, P. 2022. [‘The Government is already in breach of its own Climate Act: Sectoral emissions ceilings are flawed in law and science and must be urgently revised’](#) | Irish Times ⁹
Dehon, E. 2021. [‘Don’t sink Paris: Legal basis for inclusion of aviation and shipping emissions in Paris targets.’](#) | Transport & Environment

climate plans to be specific so as to enable any "interested member of the public" to determine their effectiveness and appropriateness.

- CLM is furthermore concerned about the lack of adequately ambitious action within CAP24 to deliver “deep, rapid, immediate and sustained” reductions in emissions.¹⁰ CAP24 does not provide a clear timeline to phase out all fossil fuels, and government support continues for infrastructure projects like the expansion of Dublin Airport, which contradict carbon budgeting objectives and the national climate objective especially as the first two carbon budgets do not cover emissions from international aviation and shipping. Moreover, uncertainties persist within CAP24 regarding emissions reductions in the LULUCF sector and heavy reliance on emerging (and risky) carbon removal technologies. The plan also lacks quantification of the abatement potential of these technologies to ensure compliance with Carbon Budgets and Sectoral Emissions Ceilings.

Recommendations:

- Identify, quantify and measure policies to close the emissions gap between CAP24 and carbon budget 1.
- Ensure that all departments, local authorities, and public bodies have adequate human and financial resources and training to enable the full implementation of CAP24 and comply with their obligations under section 15 of the Climate Act.
- Include all sectors of the economy in the Sectoral Emissions Ceilings and ensure related policies are included in CAP24.
- Commit to a fast, fair and funded phase out of all fossil fuels by 2035. • Address the energy poverty crisis by adhering to the recommendations of the European Commission and developing a longer-term framework to eliminate energy poverty.
- Remove the barriers to Ireland’s National Retrofit Program, identified by Friends of the Earth Ireland.
- Invest in social housing complexes to ensure these get updates to a BER of B2 in line with the National Retrofit Program.
- Invest in installing renewable energy sources in and around social housing complexes, such as solar panels. Expand parameters for investment in social housing to extend beyond cost per unit to include statutory duties and costs related to environmental performance.
- Invest in and upscale the Local Link Services to provide affordable and reliable public transport across the country and ensure that all public transport is disability inclusive. Where possible, these transportation options should electric vehicles.
- Accelerate the establishment of a Just Transition Commission in advance of formal legislation and embed the Just Transition Guidelines into the mandates of all public bodies, local authorities, and regulators.
- Ensure that the CAP24 is consistent with the National Biodiversity Action Plan, the EU’s Biodiversity Strategy 2030, and the UN Convention on Biological Diversity.

- Invest in increased green spaces in cities and densely populated areas to promote biodiversity and awareness

¹⁰ Thorne, P. *et al.* 2024. *Ireland's Climate Change Assessment - Synthesis Report*. Environmental Protection Agency. Available at: https://www.epa.ie/publications/monitoring--assessment/climate-change/ICCA_Synthesis_Report.pdf