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31 March 2025

Re: Public Consultation on the Department of Transport Statement of Strategy 2025 - 2028

A Chara,

The Environmental Protection Agency (EPA) welcomes the opportunity to respond to the Consultation for input of views to the Department of Transport Statement of Strategy 2025- 2028.

The EPA has highlighted that a sustainable, accessible and efficient transport system is not only important for the environment and wellbeing but is also a key enabler for the economy and that the transformation of our transport sector, alongside other sectors, is critical to achieving a sustainable future. In this context, the EPA recognises the continued commitment in the Programme for Government towards improving the sustainability of Ireland's transport sector.

The EPA, in its recent State of the Environment Report, set out an urgent need for a national policy position on the environment to address the interactions, synergies and trade off across environmental policy areas and to deal with its interaction with other policy domains. The EPA suggests that the interactions, synergies and trade-offs between transport and other sectors be considered and reflected in the Statement.

In this context, EPA wishes to make the following key recommendations that are developed further in Appendix I.

1. Air pollution and noise pollution are key environmental issues that are integrally linked to transport and EPA strongly recommends that they are explicitly addressed within your Strategic Goals. Integrating them as issues will support the delivery of the multiple co-benefits for the environment and public health through the work of the Department.
2. High-level alignment between land use planning and transport planning is needed to achieve more compact development, incentivise a move away from private cars, and move trips to public and active transport and should be reflected in your statement of strategy.
3. Freight transport related GHG emissions have been closely coupled to economic growth and are projected to be responsible for more than half of all road transport GHG emissions by 2030. Timely mitigation of freight transport emissions will be necessary to achieve the overall decarbonisation goals for the Transport sector.

4. Mitigating the greenhouse gas emissions from transport is critical to achieving Ireland's climate targets. Based on the most recent EPA greenhouse gas emission projections[1], actions within the sector will achieve an emissions reduction of less than 30% by 2030 compared to 2018, while the sectoral target is for a ~50% reduction. The statement of strategy should set out your planned direction to meet the challenging goals for the sector. In addition, climate resilience of transport networks is becoming recognised in climate risk assessments (EUCRA, Chapter 15[2]) and merits attention within your strategy.

In addition to the foregoing, the EPA notes that your previous strategy indicated an expenditure of up to 35 billion on transport related infrastructure under the national development plan. Given the scope and remit of the activities of the Department and its agencies it is critical that both circular economy action and Green Public Procurement be well considered and committed to in the Statement of Strategy. The EPA wishes to highlight that it is vital that the public sector in Ireland continues to focus on leading by example in the implementation of green procurement through the inclusion of green criteria in procurement. Further information on this is also provided in Appendix I.

The EPA has included a short appendix (Appendix II) setting out some of the key research publications on transport topics completed in recent years to help inform your strategy. Details of these and over 1,000 research projects funded by EPA since 2001 are available on our online searchable database[3]. In this context, we welcome the ongoing participation of your department on the National Environmental Research Coordination Group. This alongside your engagement in the European Environment Agency/EIONET expert groups on mobility and climate change are welcomed by the EPA. Participation in these EEA groups enhances stakeholder engagement, affords access to valuable environmental data and assists alignment your department with European policies for more informed and effective decision-making.

The inputs and recommendations provided here reflect those submitted to the consultation issued last year by the DoT and former Minister Ryan on "Moving Together – A Strategic Approach to the Improved Efficiency of the Transport System in Ireland"[4] . Further information to inform the Statement of Strategy can be found in the Air (Ch.2), Noise (Ch. 3), and Transport (Ch. 11) chapters of the State of the Environment (SoER) report[5].

The EPA looks forward to continuing to work with you as part of the review process of the new Department of Transport Statement of Strategy 2025 - 2028 and is available to discuss any aspect of this submission.

Yours sincerely,

Dr Eimear Cotter
Director

[1] https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-greenhouse-gas-emissions-projections-2023-2050-1.php
[2] European Climate Risk Assessment | European Environment Agency's home page
[3] Research Data Table Dev | Environmental Protection Agency
[4] EPAC-0924-EPA-response---Improving-the-Efficiency-of-Ireland's-Transport-System-Final.pdf
[5] State of the Environment Report – Chapter 11: Environment and Transport

Appendix I: Additional Details on Key Recommendations, Government Public Procurement and Research

Air and Noise

EPA recommends that more explicit focus is given to air pollution and noise pollution associated with transport as both are key to achieving environmental sustainability and need to be considered in conjunction with climate action. Moreover, EPA suggests that the positive benefits of the planned actions will have on health should be focus within the Statement of Strategy as the delivery of more sustainable mobility (including via active travel and public transport) has the potential to reduce both air pollution and noise pollution in addition to providing the health benefits associated with active travel.

Environmental noise is the second biggest environmental cause of health problems in the EU with transport being the largest source. In Ireland over 1 million people are exposed to noise levels above the EU mandatory reporting thresholds. Approximately 41% of the total population of Dublin, Cork and Limerick were exposed to noise levels from road traffic noise above the environmental noise directive mandatory reporting threshold. Where progress was reported by local authorities to address excessive noise it related to action on the use of low-noise road surfaces (such as stone mastic asphalt during pavement rehabilitation) and traffic calming measures to reduce speeds. The World Health Organisation (WHO) Environmental Noise Guidelines 2018 set out how excessive noise, particularly from transport sources, has negative impacts on health and wellbeing and may provide useful information for this Strategy.

As set out in the main letter a national policy position on the environment is strongly advocated by the EPA. In this context, national policy for noise is not as well advanced as other environmental areas and there is a need for coordinated national policy and action around transport infrastructure to reduce noise exposure. This may be an area of interaction that your department wishes to engage in with other relevant government departments.

Noise Action Plans developed by local authorities are the current key mechanism for addressing transport noise. the. These plans set out actions around avoiding, preventing or reducing on a prioritised basis the harmful effects of environmental noise from transport sources. Delivering on these plans is fundamental to the delivery of your Department's mission (*To deliver a …..safe and sustainable transport system…*) and should be explicitly reflected in your strategic goals on sustainability and safety.

The most critical one air pollutant associated with transport is nitrogen dioxide (NO_2). The revised European Air Quality Directive (2024/2881/EU) set stricter limits and target values from 2030 including a halving in the NO_2 annual average limit from 40 to 20 µg/m³. Achieving the new WHO targets by 2040, as set out in the Clean Air Strategy, along with the interim targets for 2026 and 2030, will present significant challenges.

The revised Directive mandates the development of air quality roadmaps including a list of control measures, if target values for 2030 are exceeded between 2026 and 2029. Furthermore, Local authorities will be required to prepare air quality plans if these thresholds are surpassed after January 1, 2030. Based on EPA monitoring, the ambient air quality targets for 2026 and 2030 are likely to be breached in several towns, necessitating the creation of these roadmaps. In this context, the

development of future Action Plans and Metropolitan Transport Strategies will need to consider how they will impact on the delivery of the Directive and associated roadmaps and the Clean Air Strategy for Ireland.

Given the clear linkage between traffic volumes and nitrogen dioxide concentrations, overall strategic objectives that include the reduction of the total kilometres travelled by vehicles have the potential to lead to reductions in urban nitrogen dioxide concentrations with positive, linked, health impacts. Measures such as reducing car traffic around schools have the potential to be a positive development. Measures that include empowering and supporting local authorities and in relation to zero-emissions vehicles can achieve improvements in air quality, reducing emissions of transport derived air pollutants such as nitrogen oxides, and particulate matter.

Integration between land use planning and transport planning

High-level integration between land use planning and transport planning is needed to achieve more compact development, incentivise a move away from private cars, and move trips to rail, bus, cycling and walking.

Shifting to these modes is an essential part of a sustainable and climate-neutral transition for the transport sector. EPA notes that the draft revised National Planning Framework has a strong focus on transport-oriented development indicating recognition of the need for better integration between physical planning and transport planning. While the Framework has not key been finalised this need for alignment between policy areas is key to enabling effective and efficient delivery of sustainability and should be reflected in the Statement of Strategy.

Climate

It is essential that the actions to deliver on Ireland's climate and environmental targets related to transport are prioritised in the new Statement of Strategy.

The EPA notes the commitments to climate action set out in your current Statement of Strategy under your Strategic Goal 2 (Sustainability: Economy, Environment and Society) and your target outcome to reduce CO_2 emissions from the transport sector. Ireland must rigorously implement existing environmental plans and programmes to achieve the benefits that they were developed to deliver.

The challenges for reducing emissions in Ireland's transport system are multifaceted and cross cutting in nature. "Ireland's Climate Change Assessment"[6] (ICCA) report published by the EPA in January 2024 identified that significant reductions, if not the complete elimination of fossil fuel usage, is required and that the "Avoid–shift–improve" approach provides a framework to deliver the necessary transformations across all sectors, including transport. The report highlights that planning compact development within urban areas will be important to reduce greenhouse gas emissions associated with land use change and urban sprawl as well as reducing transport emissions. This can also be important in reducing infrastructural costs and losses in biodiversity and undeveloped land.

EPA greenhouse gas inventories and projections

[6] Ireland's Climate Change Assessment (ICCA) | Environmental Protection Agency

Decoupling of Transport emissions through electrification and a range of Avoid and Shift measures that target transport demand is essential for Ireland to meet its Transport sector decarbonisation targets.

Timely implementation of the freight transport measures in the Statement of Strategy 2025 - 2028 will be necessary to achieve the overall decarbonisation goals for the Transport sector.

The EPA provisional greenhouse gas inventory for 2023[7] shows that National total emissions (including LULUCF) in 2023 were 60.62 Mt CO_2 eq., 7.8% below the 2018 baseline level for National targets. In the three years 2021-2023 64% of Ireland's Carbon Budget for 2021- 2025 has been used up, requiring annual emissions reductions of 8.3% per annum if Ireland is to stay within the first carbon budget.

The Transport sector has already used up 64.1% of its Sectoral Emissions Ceiling (SEC) for 2021 to 2025 and will need to reduce emissions by 12.4% per annum in 2024 and 2025 to stay within it. Fuel combustion emissions from Transport accounted for 9.2 % and 21.4 % of total national greenhouse gas emissions in 1990 and 2023 respectively, becoming the second largest emitting sector after Agriculture. This has been driven by continual increases in the size of the vehicle fleet, both passenger and goods vehicles. Since the first year of greenhouse gas inventory reporting in 1990 passenger car numbers in Ireland have increased by 191% and commercial vehicles increased by 177%.

EPA greenhouse gas projections 2022-2040, published in May 2024[8] indicate that the first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 17 per cent (With Additional Measures - WAM scenario) and 27 per cent (With Existing Measures – WEM scenario).

Emissions from the Transport sector are projected to decrease by between 5% and 26% in the WEM and WAM scenarios respectively, with the latter scenario reflecting the majority of the measures outlined in the 2024 Climate Action Plan. The projections indicate that the Transport sector could exceed the 2021-2025 Transport SEC by 4 Mt CO_2 equivalent and the 2026-2030 Transport SEC by 12 Mt CO_2 equivalent even in the WAM scenario which includes significant mitigation measures. Measures that are projected to contribute to greater emissions reductions include 945,000 EVs by 2030, a 20 per cent biodiesel blend rate by 2030 and avoid/shift measures such as a 50 per cent increase in daily active travel journeys and a 130 per cent increase in daily public transport journeys.

Decoupling of Transport emissions through electrification but also a range of Avoid and Shift measures that target transport demand will be essential for Ireland to meet its Transport sector decarbonisation targets. Mitigation measures in the Transport sector in Ireland, to date, have largely focussed on passenger transport. Implementation of initiatives within the rail sector, such as those outlined in the DoT's All-Island Strategic Rail Review[9] could further enhance the reduction in greenhouse gas emissions in the transport sector while aligning with the DoT Statement of Strategy.

Freight transport related emissions are more closely coupled to economic growth and are at higher risk of increasing if Ireland's economic performance outstrips what is assumed in the EPA Projections.

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[7] EPA-Provisional-GHG-Report-Jul24-v6.pdf The latest GHG statistics for 2023 referred to above are from the Provisional GHG inventory published in July 2024. The final GHG Inventory for 2023 will be submitted to the EU in March 2025, with a national summary report published in April 2025.

[8] EPA-GHG-Projections-Report-2022-2050-May24--v2.pdf

[9] gov.ie - All-Island Strategic Rail Review

As passenger transport is expected to decarbonise more quickly, the EPA Projections indicate that freight transport will be responsible for more than half of all road transport emissions by 2030. Timely implementation of the freight transport measures will be necessary to achieve the overall decarbonisation goals for the Transport sector.

Emissions Trading

The new Statement of Strategy should consider the projected future impact of additional policy levers such as the new phase of the EU Emissions Trading System (ETS2) and its anticipated impact on reducing transport demand and fossil fuel consumption.

ETS2 was introduced to aid reducing CO_2 emissions to the atmosphere from road transport, building, and smaller industrial sectors not included in the original EU ETS (now known as ETS1). The EPA is the competent authority for ETS2 in Ireland. ETS2 regulates fuel suppliers who pay the excise duties on the release of fuels onto the national market. It is envisaged that the carbon cost will be passed on to consumers, incentivising a reduction in fuel consumption and CO_2 emissions. A Social Climate Fund (SCF) was created alongside the ETS2 to support a fair transition towards climate neutrality, to alleviate the social and economic impacts of the ETS2.

From 2025, regulated entities are required to monitor and report their annual CO_2 emissions while trading of allowances is due to start from 1st January 2027, and surrendering of allowances to cover carbon emitted in 2027 is scheduled for 31st May 2028. While this timetable suggests that the cost of transport fuel is likely to increase from 2027 on, there are complex interactions between the carbon tax Ireland has already applied to transport fuels and ETS2. For this reason, the Department of the Environment, Climate and Communications has applied for a derogation to exempt regulated entities from their obligation to submit allowances for the years 2027 to 2030.

Climate change adaptation and resilience

The strategy should clearly align to the principles underpinning the National Adaptation Framework (NAF) and ensure that resilience in the transport sector takes account of risks identified in the National Climate Change Risk Assessment, and the Transport Sectoral Adaptation Plan.

The importance of ensuring that transport networks are resilient to the existing and projected impacts from climate change recognised at European (EUCRA [EEA, 2024][10]), National (NAF, 2024[11], NCCRA Method Report, 2024[12]), and sectoral levels. The National Adaptation Framework (NAF) sets out that, the aim of adaptation in the Transport Sector is to achieve resilience. Resilience in the Transport Sector should avoid maladaptation, use nature-based solutions where feasible, and take account of socio-economic vulnerability, cascading, compound and transboundary risks as appropriate.

Public Sector Leading by Example and Green Public Procurement

[10] European Climate Risk Assessment
[11] gov.ie - National Adaptation Framework (NAF)
[12] National Climate Change Risk Assessment | Environmental Protection Agency

It is vital that the public sector in Ireland continues to focus on leading by example in the implementation of green procurement through the inclusion of green criteria in transport related purchases.

EPA notes that your previous strategy indicated an expenditure of up to €35 billion on transport related infrastructure under the national development plan. Given the scope and remit of the activities of the Department and its agencies it is critical that both circular economy action and Green Public Procurement (GPP) be well considered in the Statement of Strategy.

The EPA has reported a low level of implementation of GPP by Government Departments. This is a missed opportunity to purchase more resource efficient and less polluting goods, services and works within the marketplace. For the 2022 reference year data, green criteria were incorporated in 45% of the total number of contracts issued (over €25,000) by government departments for the priority sector Transport[13]. This represented 81% of the total value of Transport contracts (over €25,000) issued. The EPA's report includes five key recommendations for government departments to support implementation of GPP, and it is recommended that Department of Transport ensures that these are fully actioned.

Successive Climate Action Plans have called out the key leadership role of the public sector in leading by example and delivering climate action, and implementation of GPP has been a focus of the Public Service Climate Action Mandate (and the separate mandates that apply for local authorities, commercial semi-state bodies and the school sector). The Government's GPP Strategy and Action Plan, Buying Greener (published in April 2024), includes measures to progress GPP implementation such as monitoring and reporting, training and awareness and further development of national GPP guidance and criteria. The strategy also has a key sectoral focus with related GPP targets. Future Climate Action Plans can link to the actions and targets in this policy document. The EPA's national GPP criteria for Road Transport Vehicles and Services[14] was updated in line with policy and legislation in July 2024 and is a key support to implementing GPP in this priority sector.

[13] GPP Monitoring & Reporting by Government Departments: Reference Year 2022
[14] Irish GPP Criteria: Road Transport Vehicles & Services

Appendix II: Selected EPA-funded Research Reports

Your attention is also drawn to published EPA-funded research related to transport and mobility systems, which may provide a useful resource and help inform aspects of the Strategy.

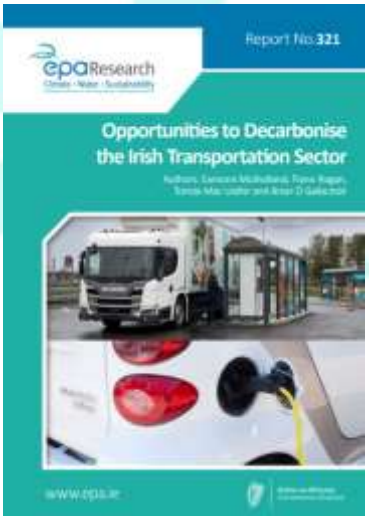
Research 338: Greening Transport

Author: Brian Caulfield, TCD. Year published: 2020.

Sustainable travel measures seek to modify travel behaviour in favour of green alternatives such as active modes (walking and cycling), public transport and smarter use of private cars, namely car-sharing and carpooling. This research offers a unique approach to the field of transport policy, entitled "carshedding", which exclusively centres on incentivisation strategies for sustainable modes of transport. This seeks to stimulate voluntary travel behaviour change and encourage sustainable deliberation of transport mode choice. "Car-shedding" is defined in the research as a means of encouraging the reassessment of the need to use a private vehicle for certain trip purposes. Improving walking and cycling facilities, enhanced public transport services and car-sharing are all examined in this research to determine their benefits and potential emissions reductions.

Link to report: Research_Report_338.pdf

Research 321: Opportunities to Decarbonise the Irish Transportation Sector



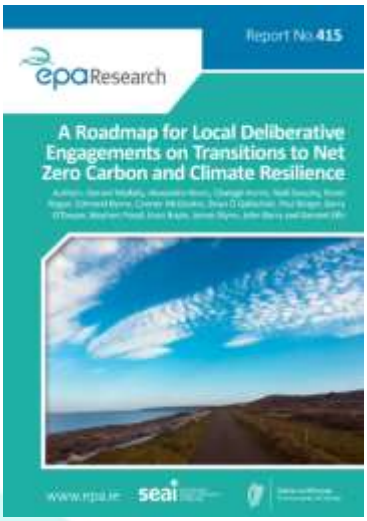
Author: Eamonn Mulholland et al., UCC. Year published: 2020.

This research developed a range of technoeconomic and socioeconomic analytic al tools and models to inform decarbonisation focused transport sector decision-taking and policymaking. The results of the research point to a series of policy recommendations. For private cars, the increased use of biofuels will be the main contributor to meeting Ireland's mandatory 2020 renewable energy in transport target of 10%. In the medium term (to 2030), Irish policy measures that incentivise the purchase of more efficient vehicles through varying tax rates should continue to be part of a portfolio of measures. In the longer term (to 2050), a key recommendation is incentivising the switch to electric vehicles. For light goods vehicles, the results point to a change in the taxation bands from the current unladen weight bands to specific carbon emissions bands. In the medium to long term, banning the sale of diesel light commercial vehicles in 2030 and encouraging the sale of biomethane-fuelled light commercial vehicles would result in a 99.6% reduction in light commercial vehicle emissions by 2050 relative to a baseline scenario (i.e., a scenario without long-term emissions reduction targets). For heavy goods vehicles, the results indicate that optimised routing, platooning, improving vehicle utilisation, back-hauling and co-loading have the potential to reduce activity by up to 36% by 2050. Adopting energy-efficient truck technologies is another key policy option with significant potential. Promoting the deployment of alternative fuels (in

particular, advanced biofuels but also some electrification potential) and the trucks that use them is the final policy recommendation.

Link to Report: Research_Report_321.pdf

EPA Research Report 415: A Roadmap for Local Deliberative Engagements on Transitions to Net Zero Carbon and Climate Resilience



Author: Gerard Mullally et al., UCC and QUB. Year published: 2022.

The Imagining 2050 project sought to develop an understanding of what the National Transition Objective of a low carbon, climate resilient and environmentally sustainable economy means for the public, policy makers and the research community and how it might be achieved. The project introduced a novel 'deliberative futures workshop' and co-created the Deliberative Futures Toolkit, together with local, scientific and policy communities. The toolkit integrates deliberative dialogues into wider democratic and multistakeholder systems and provides a resource that can be used by communities and policymakers to engage in a deliberative way in climate action discourse and in co-developing and implementing climate action solutions. The toolkit includes a range of interactive tools that can be integrated into the deliberative process and that encourages dialogue through the use of visual future-oriented methodologies.

Link to Report: Research_Report_415.pdf

Assessing the Barriers to Sustainable Transport in Ireland

Authors: David Browne, Brian Caulfield and Margaret O'Mahony, TCD. Year published: 2011.

The project sought to identify and evaluate existing and potential barriers to the delivery of sustainable travel and transport in Ireland and to qualitatively evaluate the costs and impacts of potential policies and measures that could help overcome these barriers. The primary barrier to public transport provision in local authority areas was perceived to be low urban density or insufficient economies of scale, followed by a lack of incentives for potential market entrants. Policy priorities identified included: The integration of spatial planning, land-use policy and transport investment through measures including (a) incentives for densification and consolidation in urban centres, (b) restrictions on one-off housing, out-of-town retail centres and ribbon development, (c) retrofitting of residential neighbourhoods, and (d) the creation of critical mass in key urban areas; Improvements in existing public transport services through, for example, network management, reallocation and rationalisation of existing services, improved service quality, integrated ticketing and real-time passenger information; and Promotion of the economic, social, health and environmental benefits of smarter travel through awareness campaigns, market segmentation and customised advertising. Other priorities ranged from increased accessibility to frequent, efficient public transport services to promotion of eco-driving.

Link to report: Barriers to Sustainable Transport in Ireland

EPA Research Report 398: Eco-driving: Trends and Potential Impacts for Irish Heavy-duty Vehicles

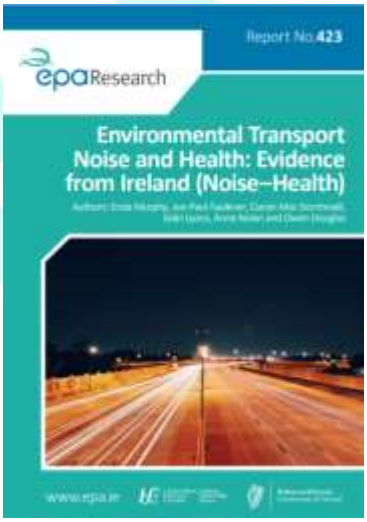
Authors: Ajinkya S. Mane and Bidisha Ghosh, TCD. Year published: 2021

Eco-driving and related practices have been shown to improve fuel efficiency and reduce vehicular emissions in HDV fleets internationally. The ECO-HDV project found that a large number of Irish haulage companies are eager to introduce eco-driver training programmes. Professional drivers should be trained or periodically instructed in how to reduce the number of incidents of harsh and general braking and idling during their journey, and how to improve their skills driving with smooth acceleration and deceleration. Eco-driving tips given to drivers may help in reducing overall fuel consumption and emissions under low traffic conditions. A policy recommendation from this study is that HDV priority signals and/or lanes should be provided within the vicinity of the Dublin Port area along with barrier-free lanes at tolls. Survey responses from both stakeholders and company owners showed that the top three expected government policies should be incentives for gas trucks, electric trucks and driver training programmes.

Link to Report: Research_Report_398.pdf

EPA Research Report 423: Environmental Transport Noise and Health: Evidence from Ireland (Noise–Health)

Authors: Enda Murphy et al., UCD and ESRI. Year published: 2022.



The Noise–Health Ireland project aimed to identify and assess the relationship between environmental noise and health in a national and international context and identify policy recommendations for considering noise in Irish policy. The principal output of the project related to the establishment of a national evidence base for the harmful effects and burden of disease of environmental noise in Ireland, informed by high quality data analysis. The report outlines key policy and practice recommendations for managing environmental noise in Ireland. It also details how “noise–health” considerations can be better incorporated into Irish policy. These recommendations aim to strengthen the capacity of Irish policymakers to design, apply and supervise effective and systematic policies in this area.

Link to report: Research_Report_423.pdf
