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EPAC Reference No-0625

10 April 2025

Re: Department of the Environment, Climate and Communications, Statement of Strategy 2025-2028

Dear Oonagh

The Environmental Protection Agency (EPA) welcomes the opportunity to submit views on the Department's Statement of Strategy for the period 2025-2028. In making this submission the EPA recognises the importance of your Department's Vision and Mission to meet many of the environmental challenges we are facing.

With respect to your Strategic Goals, the EPA recommends that Strategic Goals 1, 2 and 3 (and their Goal Statements) be retained (with minor amendment) as they encapsulate many of the outcomes needed to deliver a well-protected environment. The EPA, in the State of the Environment Report 2024 (SOER)¹, has again recommended that there be a National Policy Position on the environment. Delivering on this Policy Position can assist with the alignment of policies to deliver win wins for climate, pollution prevention and biodiversity and highlight areas where there are trade-offs or tensions between these environmental goals and/or economic and social priorities. The EPA strongly recommends that the commitment in your existing Statement of Strategy to deliver a National Statement of Environmental Policy addressing all relevant areas including climate, biodiversity and water be retained.

¹ [State of Environment Report | Environmental Protection Agency](#)

Additional comments on the individual Strategic Goals are set out in the remainder of this submission.

Strategic Goal 1: being a leader in climate action

The EPA notes the commitment in your Goal Outcome to a just transition to net zero by 2050 with a 51% reduction in GHG emissions by 2030. EPA GHG projections² indicates that Ireland is not on track to meet its national or EU 2030 emissions reduction targets. Significantly faster progress is needed to decarbonise all sectors of Ireland's economy. Increasing the pace of implementation will support the delivery of the required emission reductions and create space for adoption of further policies and measures. Consequently, the EPA suggests that your Goal Outcome reflects this need for intensification of action during the lifespan of this Statement of Strategy.

Implementation of climate adaptation measures is currently slow and fragmented and more cross-sectoral and integrated adaptation actions are needed. Doing better requires more financing, working with people and nature, monitoring and evaluating outcomes and increasing public and private sector involvement. The delivery of Ireland's first National Climate Risk Assessment by the EPA in mid-2025 will be an important step forward towards facilitating improved adaptation planning in Ireland. The EPA suggests that enabling language is included within your Statement of Strategy to address the outcome of this assessment to support action to improve Ireland's resilience to climate change across all sectors. The EPA also suggests strengthening the language on mitigation and the alignment between mitigation and adaptation to ensure the necessary Climate Action Plan measures for both continue to be prioritised.

The EPA supports retaining the Strategic Objective to 'proactively leverage expertise, evidence, research and innovation to underpin the timely development and implementation of climate policy'. The EPA will continue to work closely with your Department to support the delivery of your Research & Innovation Strategy and to facilitate the provision of policy-relevant research and evidence through the EPA Research Programme and our own monitoring and assessment activities.

Finally, the EPA suggests that reference is also made to the multiple benefits that well planned climate action can have for addressing biodiversity loss and mitigating the impacts of pollution.

Strategic Goal 2: Transforming our energy system for a secure and affordable net zero emissions future

A key priority set out in the SOER was the need for scaling up investment in infrastructure including energy infrastructure as essential to protect the environment now and into the future. Consequently, EPA suggests that commitment to enhancing investment in infrastructure is set out in the Statement of Strategy.

The EPA notes that rapidly increasing electricity demand growth from large energy users is putting pressure on energy systems and may impact on the achievement of renewable energy targets. This impact should be addressed under this Goal, and the rate of electricity demand growth (particularly generated from fossil sources) should be consistent with the expected increase in renewable electricity generation.

² [Ireland's GHG Emissions Projections 2023-2050](#)

Finally, given that substantial challenges remain to tackle Greenhouse Gases from high-intensity hard-to-decarbonise sectors, an action should be considered to seek to further explore the development of negative emissions technologies and solutions.

Strategic Goal 3: Restore, Protect and enhance our natural environment

The EPA considers that your current Goal Outcome is a very positive definition of the ambition of your Strategy relating to environmental issues. The EPA suggests that elaboration of more actions under this Goal could more accurately reflect the role of the Department in this area. Specifically, the role that the Department has in addressing environmental exposures that impact on health protection merits attention. EPA suggests prevention of health impacts due to a polluted environment should be clearly set out in the Statement of Strategy including reference to Department's roles in addressing harms from poor air quality, radon and environmental noise.

An efficient and effective regulatory regime is essential to growing a sustainable and resilient industrial sector in Ireland. The EPA supports the Department's ongoing efforts to enhance the efficiency and effectiveness of EPA licensing regimes through reform of the EPA Act, in particular with regard to partial licence reviews, General Binding Rules and further statutory licensing timelines. The publication of the EPA Bill will be an important milestone, and we look forward to future engagement on this and the transposition of the revised Industrial Emissions Directive.

The preservation of our peatlands as a vital ecosystem, carbon sink and cultural and scientific resource is of paramount importance. The EPA notes the support your Department provides to the rehabilitation of peatlands. Given the widespread illegal extraction of peat that is occurring across Ireland, EPA suggests a commitment in the Statement of Strategy to protect and rehabilitate Ireland's peatlands.

Promoting a circular economy in Ireland will reduce carbon emissions, help meet recycling targets and help address delivery challenges in infrastructure and housing. Ireland lacks sufficient circular economy infrastructure, relying heavily on other countries for material management, which risks national targets and service availability. A circular economy offers significant economic opportunities for Irish businesses, improved energy security through anaerobic digestion biogas and energy recovery, and better critical raw material supply. There is potential for circular enterprises in construction, food, drink, and biopharma-chem sectors. To encourage a circular economy, the Departmental strategy could remove barriers to material reuse and support waste prevention. This could include investment in infrastructure, enhancing regulations, procurement rules, targeted market incentives, and enforcement provisions all to promote best practices in production, supply, purchasing, use, and reuse.

With regard to your objective to improve our air quality, EPA notes the ongoing commitments in the Programme for Government to achieving cleaner air. Accordingly, the EPA recommends that there is continuity of the themes of the previous Strategy actions to implement measures to support air quality enforcement; to enact enhanced clean air legislation, particularly with the new, more stringent Clean Air for Europe Directive having come into force; and to promote awareness of the importance of clean air.

If you require any additional information in relation to points raised in this submission, the EPA would be happy to meet the relevant team to discuss further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Laura Burke', followed by a period.

Laura Burke

Director General