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**Re: Department of the Environment, Climate and Communications – Statement of Strategy 2023-2025**

Dear Mr Golden

The Environmental Protection Agency (EPA) welcomes the opportunity to submit our views on the proposed updated Statement of Strategy for the period 2023-2025 for the Department of Environment, Climate and Communications (DECC). This updated strategy, the current programme for Government and the forthcoming National Planning Framework review provide significant opportunities to integrate environmental protection across a wide range of areas within your department's remit.

The following recent EPA submissions to your department should be considered in conjunction with this letter:

- Submission on Climate Action Plan 2021 [Link](#)
- Submission on Circular Economy Strategy [Link](#)
- Submission on Geothermal Energy for a Circular Economy [Link](#)
- Submission on Clean Air Strategy for Ireland [Link](#)
- Submission on Public Consultation on Review of the National Adaptation Framework [Link](#)
- Submission on Hydrogen Draft Strategy [link](#)
- Submission on Bioeconomy Action Plan. [Link](#)

I have outlined areas of importance that you should consider when updating the Strategy.

## Strategic Goals

The strategic goals as set out in the Le Chéile 23 highlights the key areas of leadership in climate action; the need to transform our energy system for a new zero future and the need for transition to a circular economy. EPA is highly supportive of these as key strategic goals.

Updates to the Climate Action Goal should take account of the messages & developments at a global and national level. The Intergovernmental Panel on Climate Change (IPCC) 6th Assessment Report highlights the need for urgency in the implementation of climate action. At a national level there is a need to make reference to (i) the consultation on the Long term strategy for GHG emissions reductions and (ii) the need to measure the impact of the Security of Electricity Supply programme of retaining fossil fuel based generation on achieving net zero emissions. Also, at a national level key messages from the [EPA Greenhouse Gas Projections](#) published recently indicate that:

- Planned climate policies and measures, if fully implemented, could deliver up to 29 per cent emissions reduction by 2030 compared to 2018, a reduction of 4 per cent each year from 2022 to 2030. This is insufficient to achieve the ambition of 51 per cent emissions reduction in Ireland's Climate Act.
- 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 24 and 34 per cent.
- All sectors, except Residential buildings, are projected to underperform relative to the sectoral emissions ceilings. Agriculture, Industry and Electricity sectors are projected to be the furthest from their sectoral ceiling in 2030.
- Reaching the 2030 target requires implementing policies that deliver emission reductions across all sectors in the short term. This requires full implementation of the actions in the 2023 Climate Action Plan that have been defined; firm up the actions that currently don't have associated policies and measures, such as diversification in agriculture; and identify and implement further policies and measures.

Updates to the Circular Economy Goal are suggested to incorporate changes in the policy landscape since the original strategy was published. This includes the development and implementation of Ireland's second whole of Government Circular Economy Strategy, reference to development of new Green Tenders Action Plan and delivery of New Food Waste Prevention Roadmap and the inclusion of a Bioeconomy focused action (delivery of Bioeconomy Action plan).

Goal 05 objective and actions could be expanded to reflect the specific regulatory proposals which will be in place by 2030 to achieve the goal of best in class governance and regulation in areas of planning and environmental protection to reduce the administrative burden and allow for a timely regulatory response to evolving industry requirements.

A key recommendation in the EPA's 2020 State of Environment Report was that there needs to be an overall '**All of Government**' vision for protecting and managing our environment into

the future. I note the work on this vision that is being progressed by your department. The EPA would welcome a commitment in the updated strategy to the publication of this vision which would also fall within the Current Strategic Goal 5 “Ensure best in class governance and regulation”.

#### ADDITIONAL AREAS FOR STRATEGY CONSIDERATION

##### **Environmental Protection & public health**

Managing the environmental and radiological risks to health from chemicals and other pollutants is a major part of environmental protection. In the context of the new Strategy, it would be an important opportunity to first and foremost aim to protect citizens from immediate environmental harms such as poor air quality, excessive environmental noise, and, secondly, to tackle longer-term harms including radon, health and economic damage associated with climate disruption, loss of biodiversity, chemicals toxicity, and antimicrobial resistance. EPA suggests that preventing premature deaths/chronic health impacts due to a polluted or degraded environment, or because of our consumption and production behaviours, should be clearly set out in the strategy.

##### **National Co-ordination Role under Sustainable Development**

The role that the Department has in relation to implementing elements of UN Sustainable Development Goals (SDGs) numbers (7,12,13) and leading the whole-of-Government effort to foster public awareness and participation around the SDGs is well outlined in the Strategy. The EPA considered that the Department also has support roles in relation to several sub-tasks under SDG 3, 6,8,9 & 11 and recommends that this co-ordination role be highlighted as a key strategic action under Strategic Goal 5.

##### **EU Green Deal**

The EU Green Deal policy area has the potential to significantly alter investment and public finance decisions in Ireland, as well as production and consumption decisions, in ways that promote resilient and sustainable economies and societies. The updated Strategy would benefit from considering, and including relevant actions, on how the ambitions of the EU Green Deal and specifically the ‘Green Finance’ policy area and the ‘Greening’ of national recovery, including the application of Green Public Procurement, could be provided for so as to leverage, and accelerate, national low-carbon and sustainability transition ambitions.

The proposed Green Claims Directive will require companies to substantiate environmental claims about their products with a standard methodology to assess their impact on the environment. This aspect should be captured in the updated Strategy.

### **Evidence Supporting Policy**

Good policy making, as well as the measurement of policy outcomes, require good supporting knowledge and evidence systems. We welcome the fact that the Department is in the process of preparing its first Research and Innovation Strategy, recognising the important role Research and Innovation play in addressing environment and climate challenges. The EPA are committed to engaging with your Department on the preparation and implementation of that strategy and suggests that the updated Departmental Strategy should refer to this initiative and highlight the role research can play through developing solutions and identifying emerging risks as well as assisting in delivering on national compliance obligations.

Again, we thank you for the opportunity to contribute to the development of your Strategy. If we can be of any further assistance, please do not hesitate to get in touch.

Yours sincerely,



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**Micheál Lehane**

Director