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Department of Climate, Energy and the Environment

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EPAC Reference No: EPAC-1126

Re: Public consultation on the next update to the Climate Action Plan – Climate Priorities

27th August 2026

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to submit our views on the next update to the Climate Action Plan – Climate Priorities.

EPA greenhouse gas Inventory and Projections inform the monitoring of Ireland's climate action performance on a national and sectoral level. The data and evidence published in 2026 highlight the challenges that Ireland faces in achieving the scale and pace of greenhouse gas emissions reductions required to stay within the first two carbon budgets and reduce emissions by 51% relative to 2018.

As detailed in EPA's latest [Greenhouse Gas Projections Report](#), by 2030 Ireland is projected to reduce emissions by 13% to 25% against the national target of 51% on 2018 levels. In terms of the EU's Effort Sharing Regulation, by 2030 Ireland is projected to reduce emissions by 13% to 25% on the target of 42% on 2005 levels.

Closing the gap to meet our targets needs to be through (1) the acceleration of existing measures, particularly in the largest emissions sectors, and (2) in combination with policies and measures that will deliver the 26 Mt CO₂ eq of unallocated savings in Carbon Budget 2 that currently lack dedicated policy measures.

The first of five key priorities arising from the EPA State of Environment Report 2024¹ is: "Delivering a national policy position on the environment", where the Agency identified there is an urgent need to have a national policy position on the environment to address the complex interactions, synergies and trade-offs across environmental policy areas and to deal with its interactions with other policy domains.

The Report also underscores the need for Ireland to be resilient to ongoing and future climate change impacts. The implementation of climate adaptation measures is currently too slow and fragmented. More cross-sectoral and integrated adaptation actions can deliver multiple benefits. Doing better requires more financing, working with people and nature, monitoring and evaluating outcomes and increasing public and private sector involvement. The outstanding Climate Action Plan actions should

¹ <https://www.epa.ie/our-services/monitoring--assessment/assessment/state-of-environment-report/>

be completed as a priority, to ensure continuity, deliver planned emissions reductions, and maximise progress towards climate objectives.

In addition, the State of the Environment Report affirms that effective land use can provide natural, social and economic benefits. How we use our land can support climate action, nature restoration, protection of water quality and a sustainable economy through implementing a multiple benefits approach. To do this the Climate Action Plan must support reframing the approach to national land use decisions. A holistic and integrated view across all the demands on Ireland's land is necessary to realise this potential.

As with previous Climate Action Plans, the EPA has participated in Climate Action Plan working groups as well as providing data and briefings to author teams on the latest EPA Greenhouse Gas Inventories and Projections and other matters as required. The Agency has also previously provided input to earlier consultation exercises, much of which remains relevant to this cycle of Climate Action Planning:

- EPAC-0524 Consultation on the draft Climate Action Plan 2024 and associated SEA Environmental Report and Natura Impact Statement, April 2024²,
- EPAC-0225 Review of Large Energy Users Connection Policy, March 2025³
- EPAC-1125 Consultation on Carbon Budgets, June 2025⁴.
- SCP260403.2 Consultation on Draft National Nature Restoration Plan and SEA Environmental Report, July 2026.

The core issues the Agency recommends are focused for this Plan are:

- Ireland remains behind on 2030 delivery despite apparent progress against the first carbon budget, which was achieved against a backdrop of changes in the underlying inventory.
- Agriculture and transport are two key sectors, accounting for the largest share of the Second Carbon Budget, where the next Climate Action Plan should accelerate emission reductions.
- Key agricultural measures are not yet at the required scale or pace.
- Transport decarbonisation needs stronger emphasis on avoid, shift and infrastructure delivery and to address heavy goods vehicle decarbonisation.
- Land use needs specific actions to build a national evidence base and drive land use decisions that balance socioeconomic and environmental considerations.
- Actions that can deliver multiple benefits to climate, the environment and public health should be targeted.
- Adaptation action needs measurable outcomes. Climate risk assessment and resilience standards should be linked to infrastructure, sectoral planning and future adaptation cycles.
- It is essential that Just Transition principles underpin Climate Action and that policy development and implementation are informed by quantitative and qualitative social and behavioural evidence.

We have provided our responses via the online survey to the seven questions below as follows:

² <https://www.epa.ie/publications/corporate/submissions--position-papers/EPAC-0524-EPA-response-CAP24-Final.pdf>

³ <https://www.epa.ie/publications/corporate/submissions--position-papers/EPAC-0225-CRU202504LEUConnectionPolicy-FINAL.pdf>

⁴ https://www.epa.ie/publications/corporate/submissions--position-papers/EPAC-1125-Carbon-Budgets_EPA-response.pdf

1. In Ireland's Greenhouse Gas Emissions Projections 2025-2030, the EPA now projects for the first time that we are close to meeting our first carbon budget, following a consistent trend of improving projections for that budget over recent years. In your view, which policies and measures have been the most successful in reducing Ireland's GHG emissions?

As outlined in Table 3 of latest [Provisional Greenhouse Gas Inventory](#), the Agency recognises that since 2018 significant national progress has been made in emissions reductions (-14.5%), particularly in the decarbonisation of Electricity sector (-38.0%) in combination with increased importation of electricity via interconnection (16.5% share of electricity supply in 2025 compared <0.1% in 2018).

The First Carbon Budget (CB1) was met not only through policy intervention but in combination with updates to science and data in the national inventory. Updates to the methane models in Agriculture led to a downward revision of emission by ca. 1.4 Mt CO₂ eq per annum; i.e. an additional 7 Mt CO₂ eq over this Budget period. Similarly, updates to forestry data and models in the LULUCF sector led to a downward revision of emissions by ca. 1.2 Mt CO₂ eq per annum i.e. 6 Mt CO₂ eq over the period. Had these methodological improvements not been applied to the national inventory, CB1 could potentially have been exceeded by 11.9 Mt CO₂ eq.

In respect of the most successful policy interventions, as outlined in Table 5 in the latest [Greenhouse Gas Projections Report](#), the top five policy interventions that been most successful in reducing national emissions to date are also expected to deliver ca. 60% of total potential cumulative emission reductions from 2025-2030:

- Deployment of renewables in energy generation
- Deployment of renewables in space and water heating
- Deployment of biofuels in transport
- Energy Efficiency Obligation Scheme (cross-sectoral benefits)
- Carbon tax (cross-sectoral benefits)

2. Among the measures identified in Climate Action Plan 2024 and Climate Action Plan 2025, which do you consider the highest priority to close the gap to 2030?

Progress in the two largest greenhouse gas emitting sectors since 2018, namely Agriculture (-4.7%) and Transport (-6.4%), is behind all other Climate Action Plan sectors. In addition, although closing the gap to meet our targets will largely be through the acceleration of existing measures, the 26 Mt CO₂ eq currently unallocated in Carbon Budget 2 savings still lack dedicated policy measures.

Consequently, prioritising acceleration of existing actions in the largest emission sectors, in combination with further policy development relating to the 26 Mt CO₂ eq of unallocated savings, will have the greatest impact in closing gaps to national and EU targets.

In Agriculture:

- Throughout the Second Carbon Budget 2026-2030, cumulative emissions are projected to be 90.6 to 101.8 Mt CO₂ eq i.e. 45-51% of total CB2 budget of 200 Mt CO₂ eq (without carryover from CB1).
- To date, there has been insufficient progress on the implementation of higher impact measures such as reducing slaughter age and water table management on grassland on peat soil.

- Under the latest Teagasc Marginal Abatement Cost Curve ([MACC 2023](#)) assessment, reaching the 2030 target relies heavily on the use of feed additives. Current uptake of methane-reducing feed additives in Ireland remains largely confined to [research trials](#) and [a small number of commercial demonstrations](#); consequently it is now increasingly unrealistic to have the required impact on its own, given the required scale and rate of adoption.
- Evidence of an implementation pathway for agricultural diversification and its associated LULUCF impacts is lacking. Given the limited progress to date on existing high impact policies, and increasing uncertainty surrounding feed additives, prioritising and implementing diversification measures should be a core policy focus moving forward. Diversification measures that will provide multiple environmental benefits for water quality, biodiversity, flood mitigation and air quality should be identified and prioritised.
- Further action on reducing total nitrogen use is needed. Success in the roll-out of Low Emission Slurry Spreading techniques needs to be replicated in:
 - achieving target liming usage of 2 Mt per annum (0.94 Mt in 2025), which will reduce the need for synthetic fertiliser application;
 - limiting synthetic nitrogen fertiliser use. Given that 356,000 t of nitrogen fertiliser was sold in 2025, 26,000 t above the CAP ceiling for 2025, further action is needed to limit nitrogen fertiliser use to below 300,000t CAP ceiling by 2030. This action will also provide benefits for protection of water quality.

In Transport:

- Throughout CB2 2026-2030, cumulative emissions are projected to be 49.5 to 54.6 Mt CO₂ eq i.e. 25-27% of total CB2 budget of 200 Mt CO₂ eq (without carryover from CB1).
- Acceleration in the delivery of Avoid-Shift-Improve hierarchy of measures as set out in CAP23, which support reducing the need to travel in the first instance (Avoid), encourage switch from private car use to more sustainable forms of transport (Shift) and make the remaining vehicle journeys as carbon efficient as possible (Improve), is needed if we are to significantly reduce our transport emissions.
- Delivering on this hierarchy will positively impact both greenhouse gas emissions and air quality, with specific reference to the below measures:
 - Sustainable public transport and delivery of Metropolitan Area Transport Strategies;
 - Electric vehicle supports including enabling and grid connection works to support achievement of Alternative Fuels Infrastructure Regulation, high powered network schemes, a national destination and neighbourhood EV charging Plan and Local Authority EV network plan;
 - Implementation of policies supporting active travel and road safety, increasing km travelled by foot and by bike.

3. In the key sectoral areas identified (Electricity, Transport, Industry, Buildings, Agriculture and Land Use), what additional actions to those already in CAP 24 and CAP 25 could, in your view, accelerate delivery in these areas?

In Agriculture, as identified in Question 2, specific diversification measures need to be formulated, annual delivery targets set out to 2030, and impacts on both Agriculture and LULUCF emission assessed. These measures should be prioritised given the potential multiple benefits that could be achieved for water quality and biodiversity, in particular, at the same time.

In Transport, as identified in Question 2, given the challenges in decarbonising freight and drive to expand sustainable public transport, identify a clear implementation pathway for actions under the National EV Infrastructure Strategy and Road Haulage Strategy Decarbonisation Programme relating to the rollout of a high-power or megawatt charging system.

This would be in alignment with the emerging high-power public EV corridors along major freight routes being driven by the EU Alternative Fuels Infrastructure Regulation (AFIR) and Decarbonisation Zones identified in Local Authority Climate Action Plans under the Low Carbon Development and Climate Action Act 2015 (as amended).

In Land Use, as outlined in the Land Use Review Phase 2 (CAP Action LU/25/1), multifunctional land use can help balance socioeconomic and environmental considerations but implies considerable land use change. As identified in the State of the Environment Report 2024, when aligned with a national policy position on the environment, land use decisions will help Ireland to meet its LULUCF objectives, while considering water quality, biodiversity and other potential constraints, and socioeconomic opportunities, but must be informed by a strong, unified, spatial evidence base.

To accelerate action in the Land Use sector, and to respond to one of the recommendations in the Land Use Review Phase 2 (section 8.6.4), we suggest inclusion of a new action in the Climate Action Plan to be led by the Land-Use Taskforce to be established by DCEE: (1) define the minimum scope of the fine-grained knowledge base and mapping required to inform land use plans and actions; and (2) resource the specific activities required to build the required knowledge base.

Key outputs from this action would include:

- a conceptual model defining the minimum requirements for a national land evidence knowledge base capable of informing land use scenarios and identifying the capacity, suitability and constraints associated with different land use types;
- a roadmap, including assigned responsibilities, timelines and resource requirements, for the establishment and ongoing maintenance of a national land evidence knowledge base that is accessible across the public sector and updated at agreed intervals

A common evidence base also addresses barriers set out in the Joint Oireachtas Committee Report referred to in Question 5, specifically Barrier 11 to support the design of incentives at the right locations for forestry and Barrier 14 to provide evidence required to inform LULUCF decisions. The DEFRA *Land Use in England*⁵ capability maps show one approach to how this can be done in a unified way.

4. In addition to the priority areas you have already identified in previous questions, which other areas should this update to the Climate Action Plan focus on?

The EPA is responsible for the production and publication of national greenhouse gas inventories for submission to the EU and UN in compliance with the Intergovernmental Panel on Climate Change (IPCC) guidelines. Ireland's national greenhouse inventories are annually updated with latest data, include updated historical data, and science as part of the production process. Consequently, the national climate target framework, specifically Carbon Budgets and Sectoral Emission Ceilings, that are underpinned by absolute values of CO₂ eq emission, can become outdated as the science underpinning greenhouse gas emissions progresses. The inclusion of the LULUCF sector in Carbon

⁵ <https://storymaps.arcgis.com/stories/5e1833cd74654f359e5b894e77106299>

Budgets, where internationally the science is still in relatively early stages of maturation in comparison to other sectors, can be problematic to the policy system given the magnitude of revisions over a ten-year time period.

Although Section 6D of the Climate Act provides conditions for revision of Carbon Budgets and Sectoral Emissions Ceilings, the legislation does not outline specific provisions for periodic compliance checks or revision of baselines and targets in line with inventory updates as per the EU climate target framework.

The EPA would draw attention to the growth in the illegal trade of F-gases as an emerging area of concern by the [European Anti-Fraud Office](#). Despite being a minor fraction of national emissions (1.2% in 2025), emissions from high-potency F-gases increased by 5.4% from 603.39 kt in 2024 to 636.11 kt in 2025. The EPA is implementing enhanced regulatory and enforcement measures for Ozone-Depleting Substances (ODS) and Fluorinated Greenhouse Gases (F-gases) to meet revised EU requirements and combat illegal trade. It is important that progress continues to be made on the rollout of the CERTEX tracking system in support of legislative changes, reducing emissions from these potent greenhouse gases, and protecting compliant businesses from unfair competition linked to illegal trade.

Finally, previous Climate Action Plans have highlighted the role of research and innovation (R&I) to provide the evidence, technologies and solutions to enable the necessary economic and societal transitions to address climate change. We look forward to the publication of the *Framework to Guide Climate and Climate-Related Strategic Research and Innovation*, committed to in CAP 2024 (CAP Action RE/24/1), which will be important first step in aligning national R&I efforts with Ireland's climate commitments. To ensure its successful implementation, the EPA advocates that sustained and increased funding for climate and climate-related research continue to be prioritised in future CAPs. This support should recognise the importance of diverse research to inform policy, support technological development and deployment, and develop behaviour interventions and innovative governance.

5. The Joint Oireachtas Committee on Climate, Environment and Energy published a [Report on Barriers to Achieving Climate Targets \(2026-30\)](#) in February. Do you agree with the findings of this Report? What other barriers to achieving the climate targets, if any, would you identify? How best can the identified barriers be addressed?

The Report identifies 30 barriers. The Agency has focused on sectors based on their projected cumulative emissions from 2026-2030.

Agriculture

“9. High cost of approved feed additives and slurry amendments needed to reduce methane emissions from livestock and insufficient government supports to assist farmers to transition to more sustainable farming practices.”

“10. Insufficient engagement with and supports for farmers to assist with reducing the average cattle finishing age towards the 2030 target of 21.6 months.”

Please see comments on Agriculture actions under Question 2.

Transport

“15. Continued prevalence of private cars as the primary mode of transport with insufficient efforts to encourage greater adoption of alternative modes, alongside prolonged delays to major transport projects that would aid the transition from the private car to public transport.”

“16. Lengthy timelines for delivering major transport infrastructure projects, exacerbated by delays in the planning system and government delay of projects that have already received planning permission.”

“21. No clear pathway to decarbonise the Heavy Goods Vehicles (HGV) fleet and associated measures.”

Please see comments on Transport actions under Questions 2 and 3,

Electricity

“2. Grid capacity and storage challenges as a result of insufficient investment in and planning for accelerating demands on the electricity network, including rapid data centre expansion over the past decade; the inability to integrate renewable electricity sources on to the grid effectively and distribute power; loss of power under “dispatch down” due to inadequate storage.”

In comparison to the CAP target of “at least”, 5 GW of installed offshore wind capacity by 2030, our latest projections indicate delivery may be between 0.03 to 1.4 GW. Similarly, the CAP target for onshore wind is 9 GW by 2030 and projections suggest delivery may be between 6.5 to 7.1 GW. With specific reference to offshore renewable energy (ORE), these projects commonly currently require multiple consents including a Dumping at Sea permit from the EPA, in addition to a Maritime Area Consent issued by the Maritime Area Regulatory Authority (MARA). As part of an updated streamlined approach to marine planning, the Government gave approval in principle for the transfer of Dumping at Sea regulation from the EPA to MARA in November 2025; however this has not progressed. Centralising and streamlining marine consenting functions within MARA would result in considerable administrative efficiencies that would support the accelerated the delivery of ORE projects, and should therefore be progressed as a priority.

6. The principles of a Just Transition (evidence-base and structured; skills and opportunity; fair sharing of costs; social dialogue and lived experience) are explained by the [Just Transition Commission](#). What are your views on how these principles can be incorporated into the next CAP or climate action more generally?

As set out in the State of the Environment Report 2024, it is critical that people and communities are supported to achieve the changes required to address climate change. To overcome the practical barriers to climate action, and to ensure that objectives are both achievable and equitable, understanding the beliefs, attitudes and challenges facing people in Ireland is crucial. The EPA’s Climate Change in the Irish Mind Study (CCIM) has shown support for the principles of the Just Transition in Ireland, for example, reflecting a consensus for supporting transitioning industries; strong support for policies that will benefit wider society but also targeted toward low-income households; as well as indicating high levels of social engagement on climate change.

The CAP should continue to include actions that support evidence-based approaches such as CCIM, as well as structures such as the National Dialogue on Climate Action (NDCA). These provide systematic means of actively engaging stakeholders and the public with climate action across Ireland, with key activities around the development and integration of quantitative, qualitative and experimental social

and behavioural sciences to inform climate action in Ireland. In particular, EPA has funded strategic research on behavioural insights and climate communications including:

- A review of Climate Change Attitudes Using a Person Centred Framework (No 1. 2024)
- Gap Analysis on Behavioural Research Related to Climate Policy and Interventions (No 2. 2024)
- Encouraging Cooperation in Climate Collective Action Problems (No 3. 2024)
- Climate Change in the Irish Mind: Engagement Guidance - Evidence-based approaches for climate messaging (2025)

A guidance document for the incorporation of social and behavioural knowledge into policy development for climate action in Ireland is also in development and is expected to be published in 2027.

The EPA would draw attention to the support provided to DCEE through a Fast-track to Policy Evidence Synthesis Report⁶ on the development of a Just Transition Indicators Framework (CAP Action JT/25/1). The report sets out recommendations for actions related to governance, indicator development, data infrastructure and public engagement, which may be useful in informing specific actions in future CAPs.

7. The [National Adaptation Framework](#) and the [Sectoral Adaptation Plans](#) have been published. To what extent should further climate change adaptation measures be included in the next CAP?

As noted in the EPA's 2024 submission on the National Adaptation Framework, Ireland's Climate Acts commits Government to a climate-resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy by 2050. The next Climate Action Plan should make this commitment more practical by setting out the level of climate change Ireland is planning to be resilient to by 2050, for example by specifying a minimum global warming or emissions pathway.

The Plan should also make clear that Ireland must build resilience to climate impacts as they emerge, not only by 2050. This would bring the national approach closer to recent advice from the European Scientific Advisory Board on Climate Change and expected EU work on climate resilience and risk management.

International practice is also moving towards clearer adaptation standards. For example, some jurisdictions require infrastructure and regulated sectors to plan for at least a 2°C global temperature rise by 2050. Ireland should adopt a similar, practical approach, with standards reviewed and updated as climate science, observations and emissions projections change.

The next CAP should also prioritise a national monitoring and evaluation framework for adaptation. This should include clear outcome indicators so that Government can track whether adaptation actions are being delivered and whether they are improving resilience.

Finally, Ireland's first National Climate Change Risk Assessment provides a strong basis for identifying priority climate risks and deciding what level of risk is acceptable. Future CAPs should continue to use this evidence in national, sectoral and local adaptation planning, with the next NCCRA feeding into the next round of Sectoral Adaptation Plans expected in 2030.

The EPA is available to discuss all aspects of this submission and looks forward to continuing work with DCEE on this and future Climate Action Plans.

⁶ [Evidence Synthesis Report 6: Just Transition Indicator Framework for Ireland | Environmental Protection Agency](#)

Yours sincerely,



Roni Hawe

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