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Re: Consultation on the National Development Plan Review

To whom it may concern

The Environmental Protection Agency (EPA) welcomes the opportunity to provide views on the review of the National Development Plan (NDP).

The EPA notes that Ireland has made substantial progress as a nation over the past decades and welcomes the plan led approach to national development. In this context, we must ensure that the natural resources and environmental conditions essential to the economy and to social wellbeing of Ireland are protected, or we risk undoing so much of our socioeconomic progress to date.

The EPA wishes to make six core points in relation to the NDP:

1. Systems Transformation

Transformation of our energy, transport, food and industrial sectors is critical to achieving a sustainable future. Ambitious policy responses are needed that set out a roadmap for achieving the transitions required across our food, energy, mobility, and production and consumption systems. The policy responses should optimise co-benefits where possible. These policies need to be supported by governance structures and the necessary investment plans to implement them. The NDP should seek to enable and assist with the delivery of these necessary transitions.

2. Infrastructural Investment

Scaling up investment in four key infrastructural areas is essential to protect the environment. These areas are water/wastewater, energy, transport and waste management infrastructure.

3. Climate Action

Current climate action is not sufficient and needs to intensify to better adapt to ongoing climate impacts and more quickly mitigate climate emissions. The NDP should support action to address the current significant risks as identified in the National Climate Change Risk Assessment and consider how it might reduce other risks that will increase in the coming decades.

4. Circular Economy

Circular economy action and Green Public Procurement should be integrated into the delivery of projects under the National Development Plan to support the transition to a circular economy.

5. Research and Innovation

Research and innovation are key to Ireland's green transition, providing evidence for effective policy and solutions. The EPA recommends increased public investment in Research and Innovation to close the gap between Ireland and other European countries and strengthen Ireland's position as an Research and Innovation leader.

6. Biodiversity and Ecosystem Protection

Investment in the conservation and enhancement of biodiversity should be a component of the NDP.

These core points are developed in the remainder of this submission. The EPA is available to provide additional information on any points raised should you require it.

Systems Transformation

The EPA's State of the Environment Report (SOER)¹ emphasised the critical need for transformation in the energy, transport, food, and industry sectors to achieve a sustainable future. Progress is not, however, keeping pace with the pressures and is happening too slowly to address the growing locked in pressures for the next decade. In this context, we need to speed up the transition to avoid lock-ins into carbon-intensive and unsustainable production and consumption practices. This will require concerted action engaging diverse policy areas and actors across society in accelerating transformation in the core areas of energy, circular economy, transport, food systems and the just transition.

There are substantial benefits in Ireland acting within the period of operation of the NDP: it will reduce the overall cost to our society, deliver many new employment opportunities, provide more plentiful access to clean, renewable energy and afford us a healthy environment that we can enjoy. In this context, the EPA suggests that transformation is placed at the core of decisions on the allocation of resources within the NDP.

Infrastructural Investment

Our growing economy and population are increasing the pressure on our environment and highlight the need to invest in infrastructure to prevent this growth impacting on our natural environment. Collectively, these infrastructural needs constitute an extremely large delivery challenge to provide Ireland with the assets needed to meet the challenges of its growing population and economy while providing the systems that protect the environment. Decisions made under the NDP will define the

¹ [State of Environment Report 2024](#)

infrastructure that will be available to our society for the next 50 years and these decisions need to be fully aligned with achieving the transition to a low-carbon society. There is pressing need to scale up investment in four key areas that are essential to protect the environment namely water/wastewater, energy, transport and waste management infrastructure.

Water and Wastewater Infrastructure

The EPA's annual reports on wastewater treatment and public and private drinking water have raised significant issues with treatment infrastructure. The wastewater reports have set out the need for continued large scale investment in wastewater treatment systems to bring them up to standard. Similarly, reports on public and private drinking water supplies have set out that many drinking water supplies lack robust treatment to guarantee their long-term resilience and safety requiring improvements in existing infrastructure.

At the current rate of investment in water services infrastructure in Ireland, it will take decades before the requisite level of compliance and resilience will be achieved. In this context, the EPA considers that enhanced investment in water infrastructure is needed, to meet the needs of our growing society and protect the environment. In addition, the EPA strongly recommends that current investment in public drinking water and wastewater treatment should be targeted to improve treatment at priority areas where issues currently exist. The EPA publishes both a priority list of locations for enhanced urban wastewater treatment and a remedial action list for public drinking water which should inform this prioritisation. In addition to public water infrastructure, private drinking water quality, including from group schemes, lags behind public water quality indicating a need for enhanced investment to provide safe and secure drinking water quality in these supplies.

Energy Infrastructure

The EPA recognises the key role that electrification has in enabling the move to a low carbon economy as it supports the transition away from fossil fuels in many sectors. A net zero energy system brings multiple benefits, including improved energy security and significantly reduced import of fossil fuels into Ireland to meet our energy needs and provides societal co-benefits, including improved human health and air quality. In 2020, the demand for electricity was twice that of 1990. That demand is projected to grow substantially based on the increasing use of electricity for transport and heating (in both buildings and industry) and increasing requirements from high-demand electricity users. The EPA notes that the Climate Action Plan 2024 sets out the need for investment of circa €30 billion in wind & solar generation capacity together with additional billions of investments to support the unprecedented change needed in the national grid up to 2030. Recognising that the scale of investment has been considered, the EPA recommends rapid intensification of investment to accelerate deployment of renewable energy generation & storage and upgrading of grid infrastructure under the NDP.

Sustainable Transport & Infrastructure

The transport sector is a major consumer of energy and material resources and is a source of environmental pollution, particularly greenhouse gases, air pollutants and noise and progressing towards sustainable transport has the potential to positively impact on these issues. The EPA sees that a sustainable, accessible and efficient transport system as not only important for the environment and wellbeing but also as a key enabler for the economy. The EPA considers that high-level integration between land use planning and transport planning is key 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. In the context of the NDP, substantial investment is needed to deliver on the key strategic public transport construction projects while supporting this integrated approach to physical planning.

Waste Infrastructure

Ireland's annual waste generation has grown by over 20% in the last decade. Ireland's capacity to collect and treat waste is vulnerable and underperforming, with an over-reliance on other countries to treat our recycling materials, general municipal and hazardous wastes. For example, in 2022, over 1.2 million tonnes of municipal waste (38% of our national total) and more than half of our hazardous waste (220,000 tonnes) were exported for treatment. This dependency highlights a missed opportunity for the domestic treatment of many waste streams, which could benefit the economy and support a circular economy model. In terms of significant waste infrastructure, Ireland currently has three active landfills, three waste-to-energy facilities, and four cement kilns using secondary materials as fuel. There is no commercial hazardous waste landfill or hazardous waste incinerator in Ireland. In summary, from an EPA perspective, there is an urgent need for investment in waste management infrastructure.

Climate Action

The EPA recognises the substantial body of action set out in successive Climate Action Plans to deliver climate mitigation and adaption and the expenditure assessments set out in those plans to deliver which in part will relate to the NDP. The EPA does, however, note that despite all the actions ongoing we are not on track to meet our national or EU mitigation targets while also needing to intensify action to better adapt to the climate changes already occurring.

Climate Adaptation

Ireland needs to be resilient to ongoing and future climate change impacts. The implementation of climate adaptation measures is currently too slow and fragmented. Doing better requires more financing, working with people and nature, and increasing public and private sector involvement. In this context, the NDP has a pivotal role in supporting more cross-sectoral and integrated adaptation actions that can deliver multiple benefits.

In June 2025, the EPA published the [National Climate Change Risk Assessment](#) (NCCRA) which provides the first comprehensive assessment of where, when and how climate risks are likely to impact Ireland over the coming decades. This comprehensive assessment highlights the need for additional urgent action to ensure Ireland is sustainably resilient to the risks that we currently face, and will increasingly experience in the coming decades. The assessment identifies a total of 115 risks for Ireland. A total of nine risks were identified as priority risks, four of which were classified as requiring urgent action within the next five years. The four priority risks identified as needing urgent action are:

- Risk of disruption and damage to energy transmission and distribution infrastructure due to extreme wind.
- Risks of disruption and damage to communication infrastructure due to extreme wind.
- Risk of disruption, damage, and loss of transport infrastructure due to sea level rise, coastal erosion, and coastal flooding.
- Risk of damage and loss of buildings due to sea level rise, coastal erosion, and coastal flooding

The EPA recommends that these risks should be prioritised in adaptation and resilience actions to address climate risks in the National Development Plan. The EPA would be happy to provide additional information on the risk assessment or any facet of it that would inform your deliberations.

Climate Mitigation

Ireland is not currently projected to achieve its 2030 emissions reduction targets or to meet national or EU reduction targets. Our most recent projections indicate that with existing measures only a 9% reduction in GHGs will be achieved by 2030. Based on current information, the EPA projects that, at best, a 23% reduction could be achieved with additional measures currently being considered. This would require full implementation of a wide range of policies and plans across all sectors and for these to deliver the anticipated carbon savings. The EPA notes the estimated €119-125 billion capital investment needed to deliver on the Climate Action Plan (CAP) across renewable energy generation, transport, buildings, industry and agriculture (Chapter 5 CAP23, CAP24). In summary, notwithstanding the scale of the investment required, faster progress is needed to decarbonise all sectors of Ireland's economy.

Circular Economy

Ireland has a damaging linear economy characterised by the overconsumption of materials and goods and the growing volumes of waste. While recycling tonnages are increasing, these increases are being cancelled out by the growing amount of waste generated. Ireland is now almost certain to miss EU municipal and packaging recycling targets for 2025.

The European Commission's Ireland's Country Report 2024 highlighted that there is an estimated investment gap in Ireland of €827 million over 2021-2027 if we are to achieve the circular economy transition, with more investment required in eco-design, repair, reuse and remanufacturing and in infrastructure for separating waste and treatment and recycling facilities. In this context, the EPA suggests that addressing the infrastructural gap for the circular economy should be a core consideration of the National Development Plan.

Moreover, the EPA notes that the delivery of large-scale infrastructure has the potential to consume substantial physical resources and give rise to large amounts of waste materials. For example, construction and demolition waste is Ireland's largest waste stream with over 9 million tonnes of generated in Ireland in 2022 (80% soil and stone). The delivery of projects under the NDP has the potential to substantially assist in Ireland's transition to a circular economy. The EPA suggests that the delivery of projects under the NDP should seek to enhancing the use of the secondary resources and promote the recycling/recovery of waste to improve sustainability.

Research and Innovation

Research and innovation are crucial enablers of Ireland's green transition. A vibrant and effective national research and innovation system, supported by national investment, provides the evidence needed to underpin effective policy and inform technological and societal solutions to the challenges we face. National research and innovation investment also trains future researchers and innovators with vital skills, builds the knowledge economy and improves Ireland's competitiveness. Despite this, Ireland continues to lag behind other EU countries in terms of public investment in research and innovation. Eurostat figures show that that the Irish state spent €199 per person on directly funding R&I in 2023 compared to €275 on average in the EU and significantly behind the top three countries (Luxembourg at €765 Denmark at €552 and Germany at €523). The EPA recommends increased public

investment in research and innovation to close the gap between Ireland and other European countries and strengthen Ireland's position as an research and innovation leader.

Biodiversity and Ecosystem Protection

Nature underpins our food production, food security and economic development and we risk our future if we continue to marginalise nature, and its protection, and fail to deliver adequate, achievable, impactful, evidence-based and coordinated action to protect and restore it. The EPA's SOER 2024 and the National Biodiversity Action Plan set out the condition of our natural environment. For example, 85% of our protected habitats and almost one third of our protected species of flora and fauna are in unfavourable status, over half our native plant species are in decline and more than 50 bird species are of high conservation concern. The EPA noted in the SOER 2024 that nature can recover if given the opportunity. For example, Ireland's corncrake population has risen by more than 35% in recent years, reflecting the outcome of conservation investment that began in 2019. Positive actions to halt declines and to restore the key elements of our natural world must be implemented and the NDP should consider how it can assist with the delivery of improvements to our ecosystems.

In conclusion, I wish to iterate that a clean and healthy environment delivers economic and health benefits and improves the resilience of our society to the shocks that will inevitably come from climate change.

If you require any additional information on the points raised above, please contact Andy Fanning Programme Manager. (a.fanning@epa.ie)

Yours sincerely,



Laura Burke
Director General