

National Policy Framework for Alternative Fuels Infrastructure
for Transport in Ireland
Climate Change Unit
Department of Transport, Tourism and Sport
Leeson Lane
Dublin 2

21st November 2016

Our Ref: SCP160503.2

Re. Draft National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland and Strategic Environmental Assessment (SEA) Environmental Report

Dear Ms Keoghan,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 27th October 2016, regarding the above. Please find attached the EPA's submission in relation to the Draft National Policy Framework on Alternative Fuels Infrastructure for Transport (the AFF) and the associated SEA Environmental Report (SEA ER).

We refer you to Annex 1 of Directive 2001/42/EC (SEA Directive) and Schedule 2 of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. No. 435 of 2004) for "*Information to be contained in an Environmental Report*".

This submission is intended to promote full and transparent integration of the AFF-making and SEA processes as well as promote full compliance with the requirements of the SEA Directive and the SEA Regulations.

The EPA's recently published State of the Environment (SoE) report for 2016 - [Ireland's Environment – An Assessment 2016](#) (EPA, 2016) recognises that our transport system is highly fossil fuel dependent, resulting in significant emissions of greenhouse gases (GHGs) and air pollutants. We must reduce our GHG emissions from transport by 80% to meet the National Transition Objective. To achieve this target there needs to be support for a shift from the private car to an efficient sustainable transport system through a more proactive and systematic approach to land use and transport planning. Wider policy measures are needed to promote significant increases in alternative fuels and electric vehicle usage. For larger urban areas, we need to work on many different levels to have a much more integrated network, with right of way given to transport modes that reduce air pollution and GHG emissions. These aspects can be progressed through implementation of the AFF and other national level plans and programmes.

There is an urgent need for better urban and spatial planning from national level through to local level, as well as a major investment programme to encourage much more fuel-efficient transport, a switch to cleaner and alternative fuels, a rapid increase in the electrification of our car stock and a very significant shift from private car to public transport. The AFF should commit to collaborating closely with other Government Departments, including the DHPCLG and DCCAE, to integrate the policy ambitions, targets and objectives of the AFF into other key national and sectoral plans/programmes, such as the National Planning Framework and the Regional Spatial and Economic Strategies which are currently being formulated.

Specific Comments on the AFF

The AFF summarises the policy framework both nationally and internationally within which it is being prepared (including the EU White Paper on Transport, European Strategy for Low Emission Mobility, Smarter Travel – A New Transport Policy for Ireland 2009-2020, Climate Action and Low Carbon Development Act 2015, White Paper on Energy Policy and National Clean Air Strategy). It would be useful, however, to clearly state the timeframe for which the AFF is being prepared and whether future iterations of the AFF are proposed / envisaged.

The AFF considers aspects such as electric vehicles (EVs), shore-side electricity for shipping, electricity plan for stationary planes, natural gas (CNG and LNG), hydrogen, biofuels, LPG, synthetic and paraffinic fuels and associated infrastructure related considerations. The phased implementation of the Plan and related technologies should be set within the context of maintaining/improving air quality and reducing greenhouse gas emissions within the transport sector.

We acknowledge and welcome that the AFF sets out targets to achieve an appropriate level of alternative fuels infrastructure for the transport sector, which takes into account the need for Ireland to transition to a low carbon economy and which implements national (climate and energy-related) policy in particular. We also note that the AFF includes commitments in relation to non-structural aspects which are required to support the take up of alternative fuels, such as governance and taxation/grants/incentive considerations.

Budgetary considerations and funding availability

We recognise that budgetary considerations clearly play a key role in decision making on government investments in transport. However, we consider that the AFF may be overly cognisant of these limitations and rather than laying out the needed long term investments to deliver the transition to lower emission transport in terms of infrastructure to 2020 and beyond, is truncating it to fit current budgetary conditions. Given that economic conditions can change rapidly, we consider that long term plans such as the AFF should set out the required infrastructure investments needed to achieve the carbon emission reductions to meet our international commitments so that when investment and funding does become available a clear pathway is in place to develop a sustainable transport system.

Chapter 7 – Targets for Alternative Fuel Infrastructure

We note that certain targets, such as the 10% renewable transport target, are designed as a proportion of total transport use. Transport use is determined by economic output. Projections of economic growth are subject to change and therefore so too is the potential impact a certain policy has on stated targets. We recommend there would be merit in the AFF anticipating this uncertainty. Since the intermediate 2020 and 2030 targets are not an end in themselves but rather a milestone on the path to 2050, policy should be couched in a ‘worst case scenario’ of high economic growth. This minimises the chance of not meeting our targets due to economic growth and avoiding any accompanying penalties. Any overshooting of our targets in the event that economic growth is lower than assumed would merely result in a better starting point in 2020 or 2030 to progress towards 2050 targets.

While we recognise that many policies contain absolute targets and therefore are not affected directly by economic growth, their relative contribution and overall role in decarbonising Ireland’s economy is reduced with high levels of economic growth. Therefore, for the reasons cited above, it is also prudent to set these deployment targets in the context of high economic growth to minimise the possibility of this outcome.

Furthermore, we note that current targets have been revised downwards as a result of previous policy failures rather than moving to the introduction of new additional measures and accompanying infrastructure to reach these target. From a climate change perspective, we recommend that the AFF avoids a locking in of underachievement of our international commitments on greenhouse gas emissions reductions.

Chapter 8 – Measures Necessary to Ensure National Targets and Objectives are reached.

We acknowledge the various measures proposed within this section, in order to implement the various elements of the AFF and achieve the targets and objectives set therein:

- Policy measures to support the uptake of alternative fuels
- Policy measures to accelerate the move to low emission vehicles
- Environmental policy and monitoring measures
- Governance arrangement measures
- Transboundary-related cooperation considerations

Within this section, we consider that greater emphasis is required on the potential additional policies and measures necessary to meet the targets set. A policy should be introduced on the grounds that it corrects a particular market or behavioural failure that is prohibiting the uptake of alternative fuels. There must be concerted effort to identify the

factors limiting the effectiveness of current policy measures. Once these factors have been identified, policymakers can then identify how to most effectively incentivise deployment. A package of measures is required that overcomes each of the barriers with the greatest likelihood and at the lowest expected cost. If further measures are to be implemented, there should be a rationale grounded in the barrier to adoption to which they are addressing and evidence indicating the potential effectiveness of the measure. Therefore, measures to be implemented should be justified on the barriers of deployment that they overcome. Otherwise, there is an unnecessarily high risk that an ineffective package of measures is adopted. This will primarily fall under the remit of the EV taskforce but if measures are to be cited or recommended as part of the AFF, their purpose should be outlined also.

With regard to rail, while the stated aim to electrify rail public transport systems is clear, a detailed plan for the development of the infrastructure required to electrify Ireland's rail systems appears to be absent from the draft framework.

At a higher level, while the stated ambitions of the AFF are clear, we consider that the draft framework lacks sufficient detail and timelines to set out a clear pathway to a sustainable transport system that would meet Ireland's climate targets and air quality objectives. Many of the key strategic decisions needed to deliver the transition are postponed to a future date. For this transition to happen, investors and consumers will need certainty through a long term stable policy framework so that they can have confidence in making the investments in cleaner vehicles and infrastructure. That certainty is lacking when decisions are not taken on timelines for putting in place the required infrastructure to facilitate the move.

Chapter 9 – Designation of Densely Populated Areas to be equipped with publicly accessible electric charging points and CNG refuelling points

We welcome the inclusion of siting criteria considerations within the AFF, which will assist in the proper planning and development of future infrastructure for alternative fuel. The proper siting of alternative fuel infrastructure will ensure the impact on communities and the environment can be minimised, managed and mitigated. This environmentally sustainable approach to the implementation of the AFF with regards spatial planning considerations is welcomed.

Comments on the SEA ER

Environmental Baseline

We note that *Section 6.1.2 State of the Environment Overview*, and Tables 6.1 and Tables 6.2 refer to the State of Environment (SoE) Report for 2012 (EPA, 2012).. We have recently published our [SoE Report for 2016](#), which highlights, among other key issues, the need for accelerating the national response to transitioning to a low carbon society, reducing greenhouse gas emissions, climate mitigation and adaptation.

Section V – Key Messages summarises what challenges and emerging issues need to be tackled to protect and maintain our environment. These should be integrated as appropriate into the AFF. <http://www.epa.ie/ebooks/soe2016/files/assets/basic-html/page-209.html>

The 'Key Actions for Ireland' are also provided in this Section, which should be reflected as appropriate and relevant in the AFF and SEA. In particular, the actions most relevant to the AFF include

- *Action 1: Environment, Health & Wellbeing* (Recognition of the Benefits of a good quality environment to health and wellbeing),
- *Action 2: Climate Change* (Accelerate Mitigation Measures to Reduce Greenhouse Gas Emissions and Implement Adaptation Measures to Increase our Resilience in Dealing with Adverse Climate Impacts),
- *Action 3-Implementation of Legislation* (improve the tracking of plans and policies),
- *Action 5 – Sustainable Economic Activities* (Integrating resource efficiency, sustainability and performance accounting across economic sectors),

Alternatives

We acknowledge the methodology used to assess the different alternatives considered for each specific aspect of the AFF, as described in Section 8.

The main strategic issues (and associated alternatives) considered in the SEA and reflected in the AFF relate to the following:

- Market Force Influence to Drive development of alternative fuels or incentive-based initiatives to direct outcomes in more structured manner
- Level of Consumer Acceptance and barriers to confidence in alternative fuel technologies
- Government Intervention via taxation/legislation to force deployment of alternative fuel vehicles and infrastructure
- Considering Level of deployment of alternative fuel vehicles and infrastructure required

We also acknowledge the proposed mitigation measures associated with these strategic issues and note the proposed overall strategy for the AFF, as outlined in Section 8.5 of the SEA.

Assessment

We note in *Section 9.1.2 Integration of SEA and AA with development of the AFF*, that the level of influence of the SEA/AA has been outlined. It would be useful to collate the various SEA recommendations and include these in a specific section of the AFF.

As previously stated, we welcome that high level siting criteria are provided for in the SEA and included in the AFF. This shows a clear commitment that plans/projects arising out of the AFF will be set within the context of protecting environmental vulnerabilities.

Mitigation Measures

We note that the proposed Mitigation Measures within the SEA comprise *General Measures* and *Specific Policy Mitigation Measures*.

General Measures include:

- a policy to ensure compliance with Habitats Directive and consider implications on the potential effects on the Natura 2000 network
- include policy on Key Performance Indicators to monitor the implementation and effectiveness of the AFF

Specific Policy Mitigation Measures include:

- review grant schemes and tax relief over lifetime of the Plan to accommodate/consider market update/financial incentives
- eCar-related mapping improvements to better inform and enhance public confidence
- liaise with DCCAIE on roll out / implementation of Renewable Electricity Plan with view to increase generation of electricity from renewable sources
- focus support for uptake of CNG vehicles where electric vehicles (or other zero-emission vehicles) are not feasible

In *Section 9.2.8 Conclusion*, we note that many of the policy measures will be dependent on other stakeholders and that all stakeholders will need to be engaged and be responsible for implementing their respective actions to fully implement the AFF.

It would be useful to include a table or diagram highlighting the key areas of the AFF that will rely on other areas of Government taking a lead role in order to be successfully implemented. It will be important that the relevant departments are represented on the steering and monitoring groups proposed, to ensure that a shared and coordinated approach to the implementation of the AFF is achieved.

In *Section 10.2 – Mitigation*, we welcome the mitigation measures proposed in this *Chapter*. (*Table 10.1 – Mitigation Measures Relating to Assessment of Alternatives*, *Table 10.2 – Mitigation Measures Relating to Assessment of Measures*).

In addition to these measures, adherence to the Siting Criteria outlined in *Section 10.2* will contribute towards the achievement of the AFF's targets in an environmentally sustainable manner.

Monitoring

We welcome the inclusion of *Table 10.3 – SEA Monitoring Programme* in *Section 10.3*, which sets out how progress towards achieving the strategic environmental objectives of the AFF will be measured.

Future Amendments to the Draft AFF

Where amendments to the AFF are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 1 of the SEA Regulations and should be subject to the same method of assessment applied in the “environmental assessment” of the Draft AFF.

SEA Statement – “Information on the Decision”

Following adoption of the AFF, an SEA Statement, should summarise the following:

- How environmental considerations have been integrated into the AFF;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the AFF;
- The reasons for choosing the AFF adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the AFF.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned. I would also be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours Sincerely,



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