

Compendium on the status of environmental commitments made in Ireland's 2020 Programme for Government.

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2022 compendium compiled by: Rebecca Bailey and Peter Stevenson (UCD Environmental Policy Programme) from publicly available information and consultations with a wide range of stakeholders. A 2021 version of this compendium was compiled by Seán McLoughlin for the first evaluation. It is available [here](#) along with the first Report Card of Government conducted in 2021.

Commissioned by: Friends of the Earth Ireland (c/o Oisín Coghlan, Director)

Summary: In July 2022, Friends of the Earth commissioned three academic experts to independently assess the Irish Government's performance on environment and climate relative to commitments in the 2020 Programme for Government (PfG). This is the second year that such work has been commissioned. The PfG contains nearly 300 environmental or climate related commitments. The purpose of this compendium is to summarise the most up-to-date status of all environment or climate-related commitments in Ireland's 2020 Programme for Government (PfG) in order for the academic experts to evaluate the Government's performance to date. These commitments are divided into nine categories: *Climate; Nature and Biodiversity; Waste and the Circular Economy; Water and Marine; Air Quality, Transport, Buildings, Energy, and Agriculture and Forestry*. Within each category, relevant commitments within the PfG have been identified (*in blue italics*) and status updates on each commitment have been developed in consultation Government and civil service staff members; representatives from opposition political parties; non-governmental organisations (NGOs), academic experts and journalists. Special attention was paid to each commitment's progress, process and outcomes.

Three academic experts used this information, along with their own knowledge of Government policy, to score each of the nine categories. Their assessment did *not* evaluate whether commitments contained in the PfG were adequate, but rather how well the Government was keeping its word on their *own* climate and environmental promises. The latest assessment acknowledged that the current Government has served for two years while the PfG was developed with a 3-5 year timescale and evaluated performance based on the level of policy development and implementation that could reasonably be expected within two years. It is anticipated that this assessment will continue to be conducted annually over the duration of this PfG.

Disclaimer: This report is a working document developed with the input of many organisations and does not represent the views of any specific individual or organisation. In making their evaluation, experts were free to use information beyond what is presented in this document.

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1. Climate

1.1. Climate Governance

1.1a "Introduce the Climate Action (Amendment) Bill 2020 into the Dáil within 100 days. It will:"

2021 Progress: The [Climate Action and Low Carbon Development Act 2021](#) was signed into law on the 23rd of July 2021.

2022 Outcome: Completed

1.1b "1. Set a target to decarbonise the economy by 2050 at the latest."

2021 Outcome: This target was established in the Act, which mandated that the State “pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy.” In addition, the Act states that “The first two carbon budgets proposed by the Advisory Council shall provide for a reduction in greenhouse gas emissions such that the total amount of annual greenhouse gas emissions in the year ending on 31 December 2030 is 51 per cent less than the annual greenhouse gas emissions reported for the year ending on 31 December 2018.”

2022 Outcome: This commitment was officially completed in 2021 through the introduction of primary legislation to ensure that Ireland meets its net-zero emissions target by 2050 and through a broad suite of climate actions set out in the Climate Action Plan 2021. Ireland’s Long-Term Strategy (LTS), as required under the Regulation on the Governance of the Energy Union and Climate Action, was due to be submitted to the European Commission by January 1st 2020. Ireland is among a handful of countries that have not yet submitted their LTS which covers the 30 year period between 2020 and 2050.

1.1c "2. Make the adoption of five-year carbon budgets, setting maximum emissions by sector, a legal requirement."

2021 Outcome: The Act mandates the setting of five-year carbon budgets, stating that “The carbon budget, consistent with furthering the achievement of the national climate objective, shall be proposed by the Advisory Council, finalised by the Minister and approved by the Government for the period of five years commencing on 1 January 2021 and ending on 31 December 2025 and for each subsequent period of five years.”

2022 Outcome: The adoption of the first set of carbon budgets was approved by the Houses of the Oireachtas on the 6th of April 2022. Sectoral emission ranges were outlined in the 2021 National Climate Action Plan (NCAP21). However, the setting of exact sectoral emission ceilings faced [several delays](#) due to extended negotiations between Government ministers and between Coalition leaders, specifically in agreeing the emissions ceilings for agriculture. The sectoral targets were eventually agreed on the [29th July 2022](#). A statement by the Chair of the Climate Change Advisory Council (CCAC), Marie Donnelly, [expressed several concerns](#) with the Government’s sectoral emissions targets. Most crucially, the agreed sectoral targets “only amount to a reduction of 43%”, significantly below the 51% target outlined in the Climate Action and Low Carbon Development (Amendment) Act. Furthermore, while percentage reductions by 2030 are laid down, “they do not illustrate how these are consistent with the Carbon Budgets”. Finally, the CCAC pointed out that the agreed sectoral targets currently exclude the Land Use Sector, which is a net source of emissions in Ireland.

1.1d "3. Establish the Climate Action Council on an independent statutory footing and ensure greater gender balance and increased scientific expertise in its membership."

2021 Outcome: The Act mandates that the Minister and the Government “use their best endeavours” to ensure that the membership of the Climate Advisory Council has an appropriate

balance of scientific expertise and an equitable balance between men and women.

2022 Outcome: As of June 2022, the 14 members of the [Climate Change Advisory Council](#) are evenly split by gender. The range of expertise on the Council has been described as well balanced, with greater climate science representation than the previous Council.

1.1e "Update the Climate Action Plan annually and report progress quarterly."

2021 Progress: The development of a new Climate Action Plan was undertaken in 2021 with a [public consultation](#) held between March and May 2021.

2022 Progress: The National [Climate Action Plan 2021 \(NCAP21\)](#) was published on the 4th of November 2021. The first quarterly progress report was published in June 2022. This was an amalgamation of two quarterly reports. [A second progress report was published in July 2022 \(Q2 2022\)](#). In May 2022, the EPA [published a report](#) stating that if all plans and policies in NCAP21 are fully implemented, Ireland could deliver emission reductions of 28% (4% per annum) by 2030. While this would be in compliance with Ireland's EU emission reduction target, this is well below the 51% emission reduction by 2030 target stated in NCAP21. The [EPA stated](#), "*Urgent implementation of all climate plans and policies, plus further new measures, are needed for Ireland to meet the 51 per cent emissions reduction target and put Ireland on track for climate neutrality by 2050.*" The public consultations for the next update of the Climate Action Plan are now underway and close in September 2022, with an expectation that the new version will be published in November 2022.

1.1f "Maintain the existing Climate Action Delivery Board model."

2021 Progress: The existing model has been maintained.

2022 Progress: The Climate Action Delivery Board's terms of reference were [updated in November 2021](#) to include monitoring of sectoral emissions ceilings and carbon budgets. While these changes were welcomed, stakeholders remarked that improvements still need to be made -For example, ensuring that adaptation is adequately integrated into national decision-making; and further clarity on the interaction and reporting between national, sectoral and local governance structures, including the role of the Climate Action Delivery Board. Since its last review, the Climate Change Advisory Council noted the change of the Terms of Reference of the Climate Action Delivery Board. It welcomed that the Delivery Board is now meeting regularly, but the Council urged that the reporting analysed by the Delivery Board is well focussed on the most critical 20% of actions to maximise the impact that such a body can have on the acceleration of delivery.

1.1g "Propose that the Oireachtas should establish a standing Joint Oireachtas Committee on Climate Action, with powers similar to the Public Accounts Committee."

2021 Progress: While the Climate Action and Low Carbon Development Act 2021 specifies that a Joint Oireachtas Committee will be continuously involved in various aspects of climate action, in 2021 the Oireachtas had yet to establish a standing Joint Oireachtas Committee on Climate Action with powers similar to the Public Accounts Committee.

2022 Progress: The Joint Oireachtas Committee on Climate Action with similar powers to the Public Accounts Committee remains to be established. No clear progress has been made on this commitment. Stakeholders felt it was unclear what "*similar powers*" meant in a practical context. However, the existing committee (the Joint Oireachtas Committee on Environment and Climate Action) was praised for its capacity to perform detailed analysis of Irish climate policy.

1.1h "Ensure that the Department of Climate Action has the capacity and expertise to manage the transition in energy efficiency and renewable energy and to carry out its expanded function in relation to carbon budgets."

2021 Progress: The information needed to assess progress towards this commitment was not publicly available but expected to be released as part of Budget 2022.

2022 Progress: €858 million was allocated to Department of the Environment, Climate and Communications under Budget 2022, an increase of 19% over the previous year. The capacity and expertise of this department has been significantly expanded. This expansion is ongoing and there are remaining positions to be filled, according to a Government representative.

1.1i "Review on an ongoing basis the structure and operations of state agencies that will be responsible for delivery of increased targets under this plan."

2021 Progress: No review of such state agencies was made public in 2021.

2022 Progress: According to a Government representative, these reviews are currently being carried out. In July 2022, the Government published a new [Public Sector Climate Action Mandate](#). The EPA State Agency review has been completed and the SEAI have a new strategy which will be published shortly. However, NGO representatives were not aware of work being carried out on this commitment.

1.1j "Work with the European Commission to advance a stronger National Energy and Climate Plan (NECP) for 2030, consistent with the ambition of this programme."

2021 Progress: No obvious progress on this commitment.

2022 Progress: The strengthened NECP is not yet submitted. This [must be submitted by May 2024](#).

1.1k "Respond to the OECD review of the Environmental Protection Agency and ensure that our legislative framework for licensing pollution is fit for purpose."

2021 Progress: No response to the OECD review was made public in 2021.

2022 Progress: Amendment 125 of the Circular Economy and Miscellaneous Provisions Act 2022 addresses the EPA licencing framework. This legislation was signed into law by President Higgins in July 2022.

1.1l "We will conduct a review of greenhouse gas emissions on a consumption basis, with a goal of ensuring that Irish and EU action to reduce emissions supports emission reductions globally, as well as on our own territories."

2021 Progress: This review has not been announced or publicised.

2022 Progress: This review has not been announced or publicised.

1.1.1. Just Transition

1.1.1a "Publish a Just Transition Plan, to frame the work of a permanent Commission for Just Transition. The plan will identify and prepare for challenges that will arise in a number of sectors and regions, recognising that there will be a variety of different transitions, and that it is clear that there will be no simple one-size fits all approach."

2021 Progress: There was no document entitled "A Just Transition Plan" published since the inception of the government.

2022 Progress: There appears to be no progress towards a [national](#) Just Transition Plan. While acknowledging that work has been carried out in the Midlands region regarding the Just Transition, Sinn Fein Deputy Darren O'Rourke [raised concerns](#) regarding the "narrow scope of what the

Government means by a just transition, which seems to be limited to the midlands” in a May 2022 Dail debate.

1.1.1b "Establish the Just Transition Commissioner as a statutory office, with appropriate staffing and resources. The experience of the Just Transition Commissioner's work in the Midlands and the work of the National Economic and Social Council will inform the approach."

2021 Progress: The Just Transition Commissioner was not yet established as a statutory office in 2021. In March 2021, [Minister Ryan stated](#) that “A number of reports and plans focused on just transition, currently under development, will address this commitment”.

2022 Progress: The Commission has yet to be established. Kieran Mulvey was appointed as the Just Transition Commissioner in [November 2019](#). In NCAP21, the Government committed to establishing a statutory Just Transition Commission. However, legislation has not been brought forward. As of June 2022, the Minister for the Environment, Climate and Communications has noted that [“a policy approach for the mandate of the proposed Commission”](#) is being developed and has noted further stakeholder engagement “to further inform the Government's approach to the proposed legislation” and expects the General Scheme of legislation to be produced by the end of this year. NESC has been undertaking analysis of just transition within the agricultural sector. The Just Transition Alliance are [calling for the Government](#) to immediately establish the Commission, in advance of formal legislation, based on social dialogue and comprised of representatives of government, trade unions, employers, affected communities and civil society. A perceived lack of urgency in the approach to developing the Commission has been criticised by civil society groups. Furthermore, during debates on this issue in the Dail, opposition TDs have argued that this must be established immediately to prevent job losses, maintain living standards and protect rural communities, particularly those in the [Midlands](#) and [Donegal](#). Opposition TDs have also criticised the Green Party's [lack of dialogue with the social partners, rural communities and worker's unions](#) affected by these issues.

1.1.1c "Ensure that financing is available and continue to grow the size of the Just Transition Fund."

2021 Progress: In Budget 2020, published by the previous government, the size of the Just Transition Fund was [listed as €6 million](#). In June 2020, it was announced that the size of the Just Transition Fund was [now €11 million](#). The latest announcement regarding the size of the Just Transition Fund was made during Minister's Questions in March 2021, when [Minister Ryan stated](#) that 16 'strand 1' projects, had concluded Funding Agreements with his Department, to a total value of €1.2m and that further provisional offers of funding to 'strand 2' projects, totalling €27.8 million, were made to 47 projects in November 2020.

2022 Progress: Under Budget 2022, €34 million was allocated to Just Transition Projects. Ireland has secured €84.5 million from the EU Just Transition Fund for the period of 2021-2027, which will be matched by the Exchequer for a total of €175 million. The importance of the Just Transition Fund was stressed by stakeholders in order to ensure a smooth transition for the entire fossil fuel and associated industries, with significant resourcing required for the peat sector.

1.1.1d "We will ensure that the Just Transition in the Midlands works inclusively by (1.1.1e-i):"

1.1.1e "1. Supporting the Just Transition Commissioner in designing a comprehensive and inclusive response."

2021 Progress: The wording of this commitment made it difficult to provide information on as the commitment does not define exactly what such support might look like.

2022 Progress: Four [‘Just Transition Progress Reports’](#) have been published by Kieran Mulvey, the current Commissioner. Recommendations from these reports include engagement with the

Midlands Regional Transition Team, adequately resourcing National Just Transition Fund Projects and providing greater access to education opportunities.

1.1.1f "2. Publishing and implementing a detailed all-of-government implementation plan consistent with the recommendations of the first report of the Just Transition Commissioner."

2021 Progress: No such plan was published in 2021.

2022 Progress: [According to the Government](#), the recommendations of the Just Transition Commissioner were incorporated into Chapter Seven of NCAP21, entitled "A Just Transition Plan for the Midlands Region". Details of the proposed actions, including projected timelines and organisations responsible for implementation, are included in the [Annex of Actions](#) for NCAP21.

1.1.1g "3. Conducting a feasibility study into the establishment of a Green Energy Hub/Renewable Energy Hub in the Midlands, using the existing infrastructure in this region."

2021 Progress: During Minister's questions in March 2021, Minister Ryan stated that a feasibility study into the establishment of a Green Energy Hub using the existing infrastructure at the West Offaly and Lough Ree sites had been underway over the preceding months. He stated that this was being [overseen by a steering group](#) chaired by ESB, and included representatives from his Department, relevant Local Authorities, and the Just Transition Commissioner.

2022 Progress: On the 18 June 2021, the ESB stated that ["following a comprehensive feasibility study in recent months, both our sites at Shannonbridge and Lanesborough have the potential for providing energy services which would facilitate the growth in renewable generation"](#). A Government source confirmed that this feasibility study was completed by the ESB and published internally.

1.1.1h "Support for the workers, sectors, and regions most exposed, in order to help them to benefit from the new economic opportunities afforded to us by the transition to a low-carbon, digital economy."

2021 Progress: No information could be found on this commitment.

2022 Progress: On the 17th July 2021, the Taoiseach, Minister Ryan and Tom Donnellan (Bord na Móna CEO) announced that [885 additional jobs in the Midlands are planned to be created over the next 4-5 years](#) as Bord na Móna transition to a "climate solutions company". In June 2022, [Minister Ryan stated](#) that €20.5 million has been committed across 55 projects in the wider Midlands region, which is estimated to create 154 'direct' and 932 'indirect' jobs.

1.1.2i "And protection for vulnerable families and communities least equipped to make the transformation."

2021 Progress: No information could be found on this commitment.

2022 Progress: In January 2022, Niamh Garvey of the National Economic and Social Council (NESC) stated that ["Further work is required to scope out the outcomes and processes appropriate for impacted individuals and communities"](#). In May 2022, Deputy O'Rourke (Sinn Féin) [stated that current government policy regarding the Just Transition is "leaving people behind"](#) and that ["at the very least we should make sure that this transition does not drive people into poverty or further into poverty. The Government is failing to do that."](#) This sentiment was echoed by civil society/NGO representatives, who stated that it is important to provide supports for vulnerable communities immediately as the transition is already happening.

1.1.2. Climate Engagement

1.1.2a "Sustained leadership from Government and the Oireachtas." AND

1.2.2b "Sustained engagement with citizens, sectors, and regions."

2021 Progress: No obvious actions arising for these commitments.

2022 Progress: As part of The National Dialogue on Climate Action, the first National Climate Stakeholder Forum was held on the 22nd of March 2022. The purpose of this Forum was to gather differing perspectives on how the Government should deliver on Climate Action. The second National Climate Stakeholder Forum was held on the [27th of July 2022](#). In 2022, the Government put in place six *"acceleration taskforces"* to ensure that action to reduce carbon emissions across every sector of the economy is scaled up over the next three years. On the 1st July 2022, the Government announced the *"Climate Conversation 2022"* (following from the Climate Conversation 2021), consisting of an online questionnaire where respondents can evaluate the Government's approach to climate change and other aspects of environmental policy. The responses will then be used in the formation of NCAP22.

1.1.2b "We will develop a new model of engagement with citizens, sectors, and regions as an early priority for Government, building on the learning of recent years. It shall embrace (1.1.2c-e):"

1.1.2c "1. Dialogue on a structured basis, so that the diverse elements of society can contribute to the process. There will be a specific youth dialogue strand."

2021 Progress: The National Dialogue on Climate Action consulted with young people early in 2021 as part of the Climate Action Plan 2021 consultation process. An Advisory Group of young people were formed to guide the development of a permanent Youth Climate Council by Q3 2021.

2022 Progress: The National Climate Stakeholder Forum was [opened on the 22nd of March 2022](#). This was described by Minister Eamon Ryan as *"coming together, listening to different viewpoints and then working collectively to identify what we can do"*. A full list of the participants in this forum can be found [here](#). The National Youth Assembly of Ireland met as the Youth Assembly on Climate [on the 2nd March 2022](#). A representative of The National Youth Assembly presented a report at the 2nd National Climate Stakeholder Forum on the 27th July 2022.

1.1.2d "2. A process of accountability on progress, including an annual review."

2021 Progress: As the Climate Action Plan had not been published yet, this commitment was impossible to give information on.

2022 Progress: The first quarterly report for NCAP21 was published on the 9th of June 2022. An independent review by the Climate Change Advisory Council is carried out each year. Their latest review in response to NCAP21 is expected to be published in September 2022. EPA's [Greenhouse Gas assessment report](#) states that plans and policies in NCAP21 will only achieve a 28% emissions reduction by 2030, falling short of the Government's 51% emission reduction target.

1.1.2e "3. The promotion of citizen, sectoral and regional involvement in delivering actions within their own sphere of influence."

2021 Progress: Through the NCAP21 Interdepartmental Engagement and Consultation Steering Group, DECC invited 26 Public Participation Networks (PPNs) to take part in a series of workshops as part of the on-going Climate Conversation. Sixteen PPNs took part in self-managed workshops in March and April 2021, with over 270 members taking part. An additional eight PPNs were invited to recruit up to 45 members to take part in in-depth focus groups taking place in April 2021. As of the 2021 Report Card, the feedback from these sessions was being [collated and analysed and to inform the structure for ongoing engagement with the Local and Community Sectors](#). In March 2021, the

Climate Action Regional Offices (CAROs) launched a website, caro.ie, to support all County and City Councils in leading Ireland's climate action efforts. These CAROs continue to support and coordinate local government in achieving climate action goals and targets.

2022 Progress: The National Dialogue on Climate Action has been highlighted as the primary vehicle for the Government to implement citizen engagement into climate action. In November 2021, the Community Climate Action Programme was launched to provide eligible organisations with the resources to assist local communities with climate action initiatives. The CAROs are currently being funded at a rate of [€2 million per year](#). In 2021, [more than 13,000 local authority staff](#) received training in climate action through engagement with the CAROs and DECC. The Nine 'Regional Enterprise Plans' published in 2022 include decarbonisation objectives for each region in addition to climate resilience measures.

2022 Process: An NGO representative commented that while engagement regarding climate action is happening, the structure of this could be improved, with better advanced notice of relevant events. Government feedback regarding how the stakeholder input has been incorporated into Irish climate policy was highlighted as a potential useful addition.

1.1.3. European Green Deal

1.1.3a "We will support the European Green Deal."

2021 Progress: According to an NGO representative, the Irish Government is now supporting climate ambition and action at a European level in a way that it has not been seen since 2011.

2022 Progress: Ireland has continued to take a progressive position under the European Green Deal. However, NGO representatives expressed concern on the position the Irish Government took on the Common Agriculture Policy negotiations last year, particularly regarding the structure of subsidies. In Common Agriculture Policy negotiations, the Government has consistently highlighted it will only adhere to the CAP legal instrument and not the non-legally binding EU Green Deal components.

1.1.3b "We will direct any relevant funding under the European Green Deal towards decarbonising projects such as renewable energy, retrofits, ecosystem resilience and regeneration, clean research and development spending, and reskilling needs to address unemployment from COVID-19 and structural shifts from decarbonisation."

2021 Progress: It remains to be seen to what extent the Government has directed the relevant funding from the various EU packages towards the decarbonising projects identified in this commitment.

2022 Progress: According to a Government representative, funding is being directed appropriately. However, an NGO representative stated that more focus and reflection is required on where the funding is directed, such as prioritising retrofits in social housing.

1.2. Greenhouse Gas Emissions

1.2a "We are committed to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050. In setting the initial carbon budget, we will incorporate measures that will initiate significant change in line with this ambition."

2021 Progress: An evaluation is only possible once carbon budgets are published.

2022 Progress: The Climate Action and Low Carbon Development (Amendment) Act 2021 established a system of three 5-year economy-wide budget periods. These budgets, proposed by the Climate Change Advisory Council, were approved by the Houses of the Oireachtas on the 6th of April

2022. Emissions allowed under the 2021-2025 Budget Period are 295 Mt of CO₂ equivalents, representing an [*“average reduction in emissions of 4.8% per annum for the first budget period”*](#). These budgets are due to be reflected in Climate Action Plan 2022. The [*EPA states*](#) that plans and policies in NCAP21 will only achieve a 28% emissions reduction by 2030, falling short of the Government’s 51% emission reduction target. Sectoral emission ceilings were agreed in July 2022. However, as noted by the Climate Change Advisory Council, these targets would only achieve a 43% emissions reduction by 2030 rather than the 51% agreed to in legislation. Despite 2021 being the first official year of the carbon budget, Ireland’s emissions [*rose by 4.7% compared to 2020*](#) and surpassed pre-Covid levels by 1.1%. While the EPA project that emissions [*will eventually fall in 2023*](#), Stephen Treacy (Senior Manager, EPA) [*stated*](#) *“Staying within the current budget now requires deep emission cuts of over 5 Mt CO₂eq per annum over the succeeding four years”*.

1.2b “We will directly draw on the National Economic Plan and associated funding to front load investment that is directly aligned with our climate ambitions.”

2021 Progress: The National Economic Recovery Plan was published on June 1, 2021.

2021 Process: Included within the plan were details as to how funding received under the European Recovery and Resilience Facility will be spent. In order to draw down these funds, the Government was required to prepare a specific plan for their use. Ireland was one of the few EU Member States which did not produce a clear plan for public scrutiny, only producing a summary document.

2021 Outcome: The Plan outlined how the Government will spend €915 million in funding received under the European Recovery and Resilience Facility. Advancing the Green Transition was labelled “Priority 1” under this, with €503 million in funding being provided. However, this level of spending on climate action was an EU requirement, not a Government decision.

2022 Outcome: The National Economic Recovery Plan has been superseded by the National Development Plan (Published 4th October 2021). National Strategic Outcome (NSO) 8, “Transition to a Climate-Neutral and Climate-Resilient Society”, anticipates that €500 million will be accrued to the Climate Action Fund to 2027 and states that €186 million had been committed to climate-relevant projects at the time of publication.

1.2c “Scale up Enterprise Ireland support for smaller companies to invest in technology for clean processes, waste, and energy efficiency.”

2021 Progress: Applications opened in 2021 for client companies to apply to the €10 million Climate Enterprise Action Fund through Enterprise Ireland for access to business vouchers and support.

2022 Progress: A €55 million ‘Green Transition Fund’ was announced on the 16th of June 2022 as part of the National Recovery and Resilience Plan. This was aimed at helping businesses move away from fossil fuels towards greener energy sources. This fund consisted of the Climate Planning Fund for Business, which aimed to assist businesses with creating strategic initiatives to reduce emissions and the Enterprise Emissions Reduction Investment Fund, allowing manufacturing companies to invest in CO₂ reducing technologies. NGOs have argued that businesses with less financial capacity should be prioritised, which does not currently appear to be the case.

1.2d “Devising a systematic programme of sectoral audits of the commercial and industrial sector to underpin, area by area, strategies to meet the new national targets. These will be developed in consultation with relevant stakeholders in those sectors to meet targets consistent with our national climate objectives (with particular potential in food, cement, and refrigeration).”

2021 Progress: There was a lack of publicly available information on this commitment.

2022 Progress: According to a Government representative, eleven working groups within the Civil Service and Government across the economy were set up to identify sectoral opportunities for

emission reductions. The output of this is included in the Climate Action Plan, which includes ranges of emissions each sector of the economy must cut before 2030. Specific sectoral emission ceilings were agreed just [before the Dail summer recess](#) were (see [Commitment 1.1c](#)).

1.2e “Expanding and incentivising micro generation, including roof-top solar energy.”

2021 Progress: A public consultation on a Micro-generation Support Scheme was open for submissions between 14 January to 18 February 2021. The policy was expected towards the end of 2021. According to one NGO representative, the proposed structure of the scheme and the terms and conditions attached to the scheme were quite problematic and concerning.

2022 Progress: The legislation for the Clean Export Guarantee tariff was [signed into law](#) on the 15th of February 2022. Domestic customers can now receive remuneration for excess energy generated and exported to the grid. The Clean Export Premium tariff enables non-domestic customers with solar projects between 6kW and 50kW to sell excess electricity back to the grid. However, the launch of this scheme was significantly behind schedule and was delivered later than planned (originally in the [“second half of 2021”](#)). NGO representatives cited a lack of clarity in the terms of this scheme as a potential issue for homeowners. Beginning in 2024, grants for microgeneration projects will be gradually reduced as they are superseded by a [new microgeneration support scheme](#). It is currently unclear if these payments will fully replace the existing grants, and some stakeholders argue this requires further consideration in light of rising energy costs and significant commitments at EU level to further increase solar PV installation.

1.2f “We shall evaluate, before the end of 2020, whether Ireland should include wetlands in its land use inventory notified under EU regulations.”

2021 Progress: From the [beginning of 2021](#), Ireland opted to include the impact of Managed Wetlands on greenhouse gas emissions and removals in its accounting under EU regulations.

2022 Outcome: This decision has been maintained.

1.2g “Every minister will make climate action a core pillar of their new departmental strategies, which must be produced within six months of the Government taking office.”

2021 Progress: There was little information made public regarding progress on this commitment in 2021. Not every department had published a new strategy, and what constituted making climate action a “core pillar” was unclear.

2022 Progress: While this commitment has not been fulfilled in all Government departments, this year a new [Climate Action Division](#) was established within the Department of Public Expenditure and Reform.

1.2h “Each minister will direct each of the agencies and offices under their department to adopt a climate mandate, under which those bodies will seek to support climate action within their own operations and among their clients and suppliers.”

2021 Progress: No obvious progress made on this commitment in 2021 as no “climate mandates” were made public by any state agencies or offices.

2022 Progress: This commitment is addressed in the Climate Action Plan under Section 9.3.2. ‘A Public Sector Climate Action Mandate’. A new [Public Sector Climate Action Mandate](#) was published in July 2022.

1.3. Climate Adaptation

1.3a “We will continue to take climate adaptation measures to ensure that the State helps protect people from the effects of climate change in Ireland which are already locked in, and we will take steps to limit any damage caused. These measures will continue to build upon the National Adaptation Framework (NAF).”

AND 1.3b “We will ensure that each Sectoral Adaptation Plan identifies the key risks faced across each sector and the approach being taken to address these risks and build climate resilience for the future.”

2021 Progress: There did not seem to have been any major policies addressing climate adaptation publicised by the current Government, in 2021 with the National Adaptation Framework and all current Sectoral Adaptation plans carrying over from the previous government.

2022 Progress: A review of the National Climate Adaptation Framework has been initiated. While climate change adaptation initiatives are being implemented at a local level, NGO representatives stated that little is being done in terms of national climate adaptation planning. According to the Climate Change Advisory Council’s 2021 annual review, a [*“significant gap remains between the ambition of the National Adaptation Framework to deliver climate resilience, and its implementation”*](#). The Council [*found a disparity*](#) in how adaptation is prioritised and resourced across Government Departments even within sections responsible for different sectors in the same Department, underlining the Council’s concern that adaptation is not given sufficient weight in decision making and is not yet sufficiently mainstreamed and resourced in policy delivery at all levels of governance.

1.3c “We will maintain a multi-annual investment programme in flood relief measures to protect communities.”

2021 Progress: The Government maintained a level of investment in flood relief consistent with the €1 billion committed to over the lifetime of the National Development Plan 2018 -2027. However, until the new National Development Plan is published, due in September 2021, it was difficult to provide information the “multi-annual” aspect of this commitment.

2022 Progress: Under the [National Development Plan 2021-2030](#), the Government committed to maintaining the €1bn funding figure outlined in the previous iteration of the NDP. However, a more focused approach to utilising this funding has been recommended. NGO representatives stated that areas for improvement include monitoring the impacts of flood relief measures on biodiversity and incorporating nature-based solutions to flood relief, of which there are currently none. Stakeholders indicated that currently implemented structural flood relief measures are ‘hard engineering’ measures which can have devastating consequences for biodiversity.

1.4. Climate Funding

1.4a “We will establish the Climate Action Fund in law within 100 days, through the early enactment of the National Oil Reserves Agency Bill. We will quickly launch a second call under the Climate Action Fund.”

2021 Progress: The Climate Action Fund was established in law on 29th of July 2020 with the enactment of the [National Oil Reserves Agency \(Amendment\) and Provision of Central Treasury Services Act 2020](#).

2022 Outcome: The second call for climate action funding has been delayed but is in progress. An open call for climate funding [is due to be launched in 2022](#).

1.4b *“We will also launch a call under a Local Environmental Innovation Fund to enhance community participation.”*

2021 Progress: There were no public calls under any fund titled the “Local Environmental Innovation Fund”. However, there were funding calls made under the EU Innovation Fund, including [a call for Small Scale Projects in December 2020](#).

2022 Progress: A Government representative stated that this funding call has been developed for small-scale projects, but has not been launched yet.

1.4c *“We will expand the Environment Fund, taking account of the consultation process that has been completed, through the introduction of new levies; and we will ring-fence this money for investment in biodiversity and climate initiatives, including a parks fund to support the development of new parks and wildlife areas.”*

2021 Progress: There was no immediate public evidence of any expansion of the Environment Fund. While the funding allocated to the NPWS was nearly doubled in Budget 2021, this is acknowledged in the Nature and Biodiversity section of this compendium.

2022 Progress: The [Environment Fund has moved to the Circular Economy Fund](#) under the recently enacted Circular Economy and Miscellaneous Provisions Act. Any remaining funds accrued to the Environment Fund were transferred to the Circular Economy Fund upon the passing of this Act. [In response to a Parliamentary Question](#) in April 2022, Minister Ossian Smyth stated that the “terms and scope” of the fund are generally unchanged. However, there is no information regarding the expansion of funding in terms of an increase.

1.4d. *“Prioritise Green Finance strategic actions that are developed in line with climate justice targets and Sustainable Development Goals.”*

2022 Progress: On the 7th July 2022, the Government published their [International Climate Finance Roadmap](#). This document describes how the Government is committing to “aligning finance with the SDGs and the Paris Agreement”, meeting the €225 million international climate financing target by 2025. According to the [Department of Finance](#), it “illustrates Ireland’s plans for scaling up its international climate financing to meet the target to provide at least €225 million by 2025, announced by Taoiseach Micheál Martin at the UN Climate Conference, COP26, in November 2021”. (For ‘Smart Finance’ progress see [Commitment 7d](#)).

1.4.1. Carbon Tax

1.4.1a *“Increase the carbon tax to 100 euro per tonne by 2030, informed by the findings of an ESRI study, to be published by October 2020 on how best to prevent fuel poverty. This increase is to be achieved by an annual increase of €7.50 per annum to 2029 and €6.50 in 2030.”*

2021 Progress: This commitment was fulfilled with the increase of €7.50 included in Budget 2021.

2022 Progress: Budget 2022 provided a further €7.50 increase on the carbon tax from €33.50 to €41.00.

1.4.1b *“We will legislate to hypothecate all additional carbon tax revenue into a Climate Action Fund raising an estimated €9.5 billion over the next ten years. Funds will be utilised over that period to:*

- 1. Ensure that the increases in the carbon tax are progressive by spending €3 billion on targeted social welfare and other initiatives to prevent fuel poverty and ensure a just transition.*
- 2. Provide €5 billion to part fund a socially progressive national retrofitting programme targeting all homes but with a particular emphasis on the Midlands region and on social and low-income.*

3. Allocate €1.5 billion to a REPS-2 programme to encourage and incentivise farmers to farm in a greener and more sustainable way. This funding will be additional to funding from the Common Agricultural Policy. It will include incentives to plant native forestry and to enhance and support biodiversity tenancies."

2021 Progress: There did not seem to have been any progress on the legal hypothecation of carbon tax revenue specified under this commitment in 2021. However, hypothecation of the revenue from both the 2020 and 2021 increases in carbon tax was laid out in the Budget 2021 document ["The Use of Carbon Tax Funds"](#). This document estimated the combined proceeds of the 2020 and 2021 increases in the carbon tax at €238m in 2021. The allocation of these increased carbon tax revenues for 2021 was as follows: €100 million in "Investment in Residential and Community Energy Efficiency", €48 million in "Targeted Social Protection Interventions", €20 million in "Pilot Environmental Programmes in Agriculture" and, finally €70 million in "Continuation of 2020 Carbon Tax Investment Programme."

2022 Progress: No progress has been made towards legislating hypothecation of the carbon tax, but the annual increase in carbon tax has been legislated in the [Finance Act](#). In response to a Parliamentary Question on carbon tax spending in July 2022, [Minister Ryan](#) stated *"The Oireachtas has legislated, through the 2020 Finance Act, to progressively increase the rate of carbon tax each year so that it will reach a rate of €100 per tonne of carbon dioxide emissions by 2030."* Under Budget 2022, the allocation of the carbon tax revenues are €202 million in "Investment in Residential & Community Energy", €174 million on "Targeted Social Protection Interventions" and €36 million for the "Continuation of the 2020 & 2021 Carbon Tax Investment Programme". NGO representatives have called for a more focused approach to the use of carbon tax funds, targeting financial interventions at those who need them.

2. Nature and Biodiversity

2a. "Progress the establishment of a Citizens' Assembly on Biodiversity."

2021 Progress: According to the last 2021 update on the Interim Climate Actions 2021, officials from the Department of the Taoiseach were engaging with officials from the relevant Departments on the approach to be taken regarding the Citizens' Assembly on Biodiversity. The estimated date for this Citizens' Assembly was Q1 2022.

2022 Progress: The first substantive meeting of the Citizen's Assembly on Biodiversity Loss was held on [the 14th of May 2022](#). While it is too early to determine its effectiveness, engagement from citizens was viewed positively by stakeholders. In addition, a [parallel Children and Young People's Assembly](#) on Biodiversity Loss was announced in March 2022 by Minister Malcolm Noonan. It will be designed and delivered by an independent research consortium involving Dublin City University, University College Cork, and Terre des Hommes, working in conjunction with a Young Advisory Team that has been established to co-design the process. It is anticipated that two weekend meetings of the Assembly will take place in October 2022.

2b. "Promote biodiversity initiatives across primary, post-primary and third-level sectors, and ensure that schools, colleges, and universities across the country play an active role in providing areas to promote biodiversity."

2021 Progress: While there was some progress on this commitment, it was difficult to provide information on the extent to which action was driven by the Government.

2022 Progress: Biodiversity education is intended to be delivered as part of an all of Government approach. The [Higher Education Authority Bill](#) (currently before the Seanad) states that institutions will be provided with support to enable *"all learners to acquire the knowledge and skills needed to*

promote environmental development and sustainability”, which includes “actions in respect of social, economic, cultural and environmental development, climate and biodiversity”. Initiatives in other levels of education are expected to be addressed in the 4th National Biodiversity Action Plan. However, Senator Mary-Alice Higgins stated that although the inclusion of biodiversity is welcome, [*“there is a very poor definition of environmental development and sustainability in the Higher Education Authority Bill”*](#). It is currently unknown how these biodiversity initiatives will be delivered. In June 2022, the Government announced the establishment of a [‘Business for Biodiversity’](#) platform, designed to enable businesses to monitor their biodiversity impact and take strategic action.

2c. “Review the remit, status and funding of the National Parks and Wildlife Service (NPWS), to ensure that it is playing an effective role in delivering its overall mandate and enforcement role in the protection of wildlife.”

2021 Progress: In early 2021, the Department of Housing, Local Government and Heritage carried out this review, which included a period of public consultation. The review was completed, and was due to be published in June 2021 but was delayed. The reason for the delay seemed to revolve around the arising of a number of complex issues which need to be worked through internally before publication. Prof. Jane Stout and Micheal O’Cinneide were appointed to carry out this review independently.

2021 Outcome: The level of funding allocated to the NPWS was nearly doubled to €29 million in Budget 2021. However, this was still [significantly less than the funding of €46 million provided in 2008](#) and according to NGO representatives, could be deemed insufficient for the NPWS to play an effective role in delivering its extensive mandate. Twenty-five new park and wildlife ranger jobs were also created.

2022 Process: €47 million was allocated to the NPWS under Budget 2022, bringing funding back up to pre-2008 levels. Furthermore, staffing is now at pre-2008 levels, with [approximately 400 staff members](#) currently employed by the NPWS. The first phase of the NPWS review was published in October 2021 and described the NPWS as an *“under-resourced”* and *“neglected”* public service. The final phases of the NPWS review were conducted by former Secretary General Gerry Kearney, whose report (published February 2022) was similarly critical. This led to the [creation of the Strategic Action Plan](#) which was submitted to and approved by the Cabinet. Numerous commitments, such as recruiting over 60 key members of staff including rangers, scientists and managerial staff are outlined in this plan. To implement the actions outlined in the plan, including establishing the NPWS as an Executive Agency *“with a full organisational restructuring and dedicated management team”*, a €55 million investment package was [announced at the National Biodiversity Conference](#) in June 2022. The funding commitment was very welcomed by stakeholders. However, how this funding is used and the scope of NPWS going forward is critical and remains to be seen.

2d. “Ensure that all local authorities have a sufficient number of biodiversity and heritage officers among their staff complement.”

2021 Progress: There were no announcements regarding the hiring of additional biodiversity and heritage officers in 2021.

2022 Progress: As of June 2022, there are only [five biodiversity officers employed by city and county councils](#). On the 8th of June 2022, Minister Noonan announced that [six new biodiversity officers](#) will be recruited in local authorities as part of a pilot scheme ahead of a planned national roll-out in 2023/2024, which will deliver 31 officers over the next three years. €600,000 has been allocated to accelerate the pilot scheme. According to a Government representative, it is now the responsibility of the local authorities to ensure these posts are appropriately staffed. A review of the biodiversity

officer programme was conducted to inform a new role description and ensure that officers are sufficiently senior. The aim is to ensure that local biodiversity officers are delivering the National Biodiversity Action Plan to local authorities.

2022 Outcome: Since September 2021, [all County Councils](#) have had a dedicated heritage officer.

2e. "Support biodiversity data collection."

2021 Progress: This is a legal requirement under various EU Directives. There were no announcements detailing additional funding for biodiversity data collection. According to NGO representatives, there were major gaps in knowledge that remain unaddressed.

2022 Progress: A grant scheme of up to €5,000 for biodiversity recording was [announced in March 2022](#). This was aimed at citizen science programmes and voluntary organisations to support species recording and identification. The National Biodiversity Data Centre continued to develop new projects, including an app for recording invasive species. In a May 2022 debate, Deputy Christopher O'Sullivan (Fianna Fail) called for an ["increase in its funding, remit and resources"](#). "Massive knowledge gaps" remain in Irish biodiversity data according to stakeholders. A lack of ICT capacity has been described as a limiting factor in biodiversity data collection and dissemination. The modernisation of ICT under the [Strategic Action Plan](#) for the NPWS aims to alleviate this.

2f. "Publish a new National Pollinator Plan and encourage public bodies to promote and protect biodiversity."

2021 Progress: In early 2021, a [new All-Ireland Pollinator Plan 2021-2025](#) was launched with support from both the Department of Agriculture, Food and the Marine and the National Parks and Wildlife.

2021 Outcome: The AIPP 2021-2025 had 186 actions spread across six objectives. It was developed by a 16-member steering group who provided oversight, with implementation coordinated by the National Biodiversity Data Centre. Responsibility for delivering the actions contained in this new Plan was shared out between the main partner organisations. The Plan did not have a project budget. Instead, those organisations that committed to taking action agreed to fund those actions themselves. The All-Ireland Pollinator Plan is voluntary, and this was a concern among stakeholders.

2022 Outcome: While the new National Pollinator Plan was not a Government plan, the Department of Heritage have supported it ["where \[they\] can"](#) and representatives of the department sit on the steering committee. However, it has been argued by some stakeholders that the plan needs ["more teeth"](#), possibly in the form of legislation. An academic stakeholder stated that more than 7,000 actions have been implemented on the ground across the country stemming from the National Pollinator Plan. However, as many of these have been done by voluntary groups, it is questionable whether the Government can take direct credit for this. The source also stated there is now funding from the NPWS for a Communities Officer and from the Department of Agriculture for a farmland officer. NPWS and DAFM have contributed to a pilot scheme that has been rolled out this year (the [Irish Pollinator Monitoring Scheme](#)). All but three of the local authorities in Ireland have signed up to support this pollinator scheme.

2g. "Review the protection (including enforcement of relevant legislation) of our natural heritage, including hedgerows, native woodland, and wetlands."

2021 Progress: No immediate evidence existed on progress towards a legislative review.

2022 Progress: [Minister Malcolm Noonan's speech](#) at the 2022 National Biodiversity Conference addressed this commitment. According to his speech, the Department of Housing, Local Government and Heritage is working to tackle wildlife crime by adopting an internal approach and by collaborating with An Garda Síochána in developing a memorandum of understanding. Bringing the Wildlife Amendment Bill back to the Oireachtas is at an advanced stage, which will *"place a biodiversity duty on State organisations and give statutory teeth to the National Biodiversity Action*

Plan". A review of Wildlife Act and Birds and Habitats Regulations is in progress but is at a very early stage. This work will take several years to complete and involves several bodies. [An amendment to the Wildlife Act](#) to confer protection on basking sharks currently before the Dail. The [Flora \(Protection\) Order, 2022](#) (signed May 2022) has added protection to additional 25 vascular plants within the state. However, there have been some bureaucratic difficulties in bringing natural heritage protection back into focus. There is no evidence of a legislative review of natural heritage protection. The Irish Environmental Pillar have called for "[a right to nature in the Constitution](#)" to ensure sufficient legislative protection for natural heritage and biodiversity. Furthermore, lack of reform regarding reviewing the protection of Natural Heritage has been [heavily criticised by the Irish Wildlife Trust](#), noting the lack of action surrounding commitments made in the 1st, 2nd and 3rd Biodiversity Action Plans. These include (but are not limited to) *Review previously proposed Natural Heritage Areas and designate as appropriate under the Wildlife (Amendment) Act, 2000* and *Elaborate and publish a framework for the selection and designation of future Natural Heritage Areas*. [Confusion exists on the Department's plans](#) to establish a dedicated "Wildlife Crime Unit" within the NPWS though the Government has assured stakeholders there will be dedicated staff assigned to this issue. This remains unclear.

2h. "Develop a new National Invasive Species Management Plan."

2021 Progress: No plan was published in 2021.

2022 Progress: This is well behind schedule. In February 2022, [the European Commission called upon Ireland](#) for its failure to "*establish, implement and communicate to the Commission an action plan... to address the most important pathways of introduction and spread of invasive alien species of concern*". Under the current legislative framework, responsibility for invasive species management [rests with the landowner](#). According to a government source, as of June 2022, this plan is still "*at an early stage*" and is anticipated to be published in 2023. While it intends to address invasive species management at a national level, it is unknown what measures will be outlined in the plan.

2i. "Coordinate the actions in the Programme for Government regarding peatlands to maximise the benefits for biodiversity."

2021 Progress: In November 2020, [€108 million of funding was approved for Bord Na Móna's Bog Rehabilitation Scheme](#). The funding will be provided by the European Union, as part of its NextGenerationEU recovery package for Europe. Grant funding of c.€230,000 was awarded to 25 local community groups for peatland projects in Q1 2021. Example projects include developing plans to restore the land, nature initiatives, recreational spaces and educational materials. [The Living Bog Project](#) also continues to be supported by the Government (See also Commitment 7.4d). In the opinion of one NGO representative, Government policy could be much more proactive when it comes to protecting and restoring peatlands.

2022 Progress: The fulfilment of this commitment is being coordinated through the interim review of the National Peatlands Strategy. Public consultation took place in summer 2021 but the findings have not been published. There will be a separate appendix in the interim review that will set out all of the actions in the PfG for peatland conservation, restoration and rehabilitation. The partial aim of this is to provide more effective communication between all parties and stakeholders involved. This due for publication in 2022.

2j. "Introduce policies on supports for urban biodiversity and tree planting."

2021 Progress: No announcements were made on these policies in 2021.

2022 Progress: Urban tree planting is primarily the remit of the relevant local authority. Lack of national progress surrounding urban biodiversity support has been [criticised as a missed opportunity](#), particularly as there is great interest from the public to implement such initiatives. According to a

[2021 CSO survey](#), “60% of urban households rated a lack of urban green spaces as a very important issue for them”.

2k. "Encourage and support local authorities to reduce the use of pesticides in public areas."

2021 Progress: No obvious progress was made in 2021, apart from some awareness raising by the All-Ireland Pollinator Plan team.

2022 Progress: The Government’s current position is that use of herbicides in public areas is permitted provided this complies with the Sustainable Use Directive and that pesticides should not be used [“unless a risk assessment has shown that their use is necessary”](#). DAFM have engaged with local authorities through presentations and regular inspections. Petitions to ban the use of herbicides in public areas [have been discussed](#) by the joint Committee on Public Petitions.

2l. "Continue to implement the third National Biodiversity Action Plan 2017-2021 and build on the commitments made at the first National Biodiversity Conference."

2021 Progress: According to one NGO representative, the vast majority of the actions within the plan remained unimplemented in 2021. In general, the opinion of this representative was that there is a lack of funding and political will to progress many of the actions.

2022 Progress: While the tenure of this plan ended in 2021, most of the commitments in the third plan remained unfulfilled. These are expected to be rolled over into the fourth NBAP. The fourth NBAP will not now appear until 2023 in order to incorporate the findings of the Citizens' Assembly. An [interim review of the 3rd NBAP was published by the NPWS in February 2020](#), concluding that *“much more needs to be done to reverse the trends in biodiversity loss.”* In addition, the National Biodiversity Forum [published a comprehensive review](#) of the third NBAP and provided a series of recommendations, including *Improved governance & stewardship of biodiversity; financing the Plan and prioritising actions; protect, recover and renew biodiversity and ecosystems’; build, connect and use the biodiversity knowledge base; and engaging communities and the private sector.*

2m. "Support local nature groups and local authorities to work in partnership on local biodiversity projects."

2021 Progress: An amount of €1.35 million was [made available in 2021](#) for The National Biodiversity Local Authority Biodiversity Grant Scheme operated by the National Parks and Wildlife Service.

2022 Progress: Speaking at the National Biodiversity Conference 2022, Minister Malcolm Noonan outlined a number of supports provided to local communities: €1.5 million has been made available in 2022 to local authorities under the Local Biodiversity Action Fund, combined with €600,000 to support the Biodiversity Officer Programme rollout. €500,000 over the next five years has been committed to the Environment and Nature Fund in partnership with the Community Foundation for Ireland. Investment in the NPWS farm plan scheme has trebled and funding has been doubled for the Community Wetlands Forum. Following the publication of the 2021 compendium, there has been additional funding [announced for community peatlands projects](#) by Minister Malcolm Noonan, the first round of which will supply 160.000 across 16 projects. However, an NGO representative stated that a “real problem” exists in coordinating communications on any action on peatlands. Several announcements were made in 2021, including in Budget 2022, but it is unclear what is new money and what is old. This funding has been complemented by a 41% increase in funding for the Irish Environmental Network, indirectly supporting local groups to work on projects with local authorities.

2n. "Continue to raise awareness of biodiversity through initiatives like the Annual Biodiversity Awards Scheme."

2021 Progress: These awards did not take place in 2021. There is no Government-backed awards scheme for Biodiversity. The exception to this was the [Together for Biodiversity Awards](#) as part of the 2019 National Biodiversity Conference. However, this was a one-off event.

2022 Progress: Public engagement in biodiversity policymaking is being sought, according to a Government representative: The 2022 National Biodiversity Conference was part of the public consultation aimed at increasing the transparency and raising the profile of the upcoming 4th NBAP. ; [National Biodiversity Week 2022](#) was launched by the Department of Housing, Local Government and Heritage and consisted of over 100 events across the country, including species identification walks, whale watching and demonstrations. As per the Strategic Action Plan for the NPWS, a new head of communications will be appointed in September 2022.

2o. "Build on the success of the UNESCO Dublin Bay Biosphere and achieve further UNESCO designations for Irish sites, including the Lough Allen region."

2021 Progress: [According to reports in June 2021](#), five sites in Ireland were expected to apply for inclusion on the country's tentative list of UNESCO World Heritage Sites: The Valentia transatlantic cable station in Co Kerry; the Burren in Co Clare; Glendalough monastic city in Co Wicklow; the passage tomb landscapes of Co Sligo; and the royal sites of ancient Ireland were all expected to be considered.

2022 Progress: A [new Tentative List](#) of potential World Heritage sites was published in July 2022. The Tentative List is an inventory of natural and cultural heritage sites that may have potential to demonstrate Outstanding Universal Value and therefore considered suitable for nomination to the World Heritage List. It is a pre-condition for nomination that a site must be on the Tentative List for at least one year before work can formally begin on a nomination dossier.

2p. "Appoint Education Liaison Officers in each of our National Parks to work with schools across the country, to promote the importance of biodiversity and the natural world, and to involve pupils in the work that goes on in our National Parks."

2021 Progress: In June 2021, responding to a direct query on the number of education liaison officers during Minister's Questions, [Minister Noonan responded](#) that "(his) Department is in contact with the Department of Education and Skills to progress matters".

2022 Progress: On 5th May 2022, Minister Darragh O'Brien, responding to a question [regarding whether an education liaison officer](#) had been appointed in each of the national parks stated that the Department of Housing, Local Government and Heritage is consulting with the Department of Education to deliver this. This was also addressed in Minister Noonan's speech at the National Biodiversity Conference, which stated that these posts will be addressed in the restructuring of NPWS staffing as per the Strategic Action Plan.

2q. "Legislate to designate our western lakes as salmonid lakes."

2021 Progress: During Minister's Questions in July, Minister Ryan stated that the proposed bye-law, intended to give effect to this commitment, was [currently in working draft form](#). A public consultation on a final draft was due to commence.

2022 Progress: The consultation for the draft bye-law [closed for submissions](#) on the 20th August 2021. Following this, no progress appears to have been made.

3. Water and Marine

3.1. Drinking and Waste Water

3.1a. "We will develop a scheme between local authorities and Irish Water to provide drinking water fountains nationwide to reduce plastic bottle litter."

2021 Progress: While there were developments such as the [installation of five water fountains in Limerick city](#), there were no announcements made regarding an overarching scheme in 2021.

2022 Progress: In an answer to a Parliamentary Question regarding this commitment in February 2022, Minister Darragh O'Brien stated a ["Drinking Water Expert Group"](#) has been convened. The Minister also stated that the Department of Housing, Local Government and Heritage has made provisions in their budget for the development of a pilot scheme to provide water fountains in co-operation with local authorities and Irish Water. However, there appears to be no further progress on this commitment.

3.1b. "We will continue to help fund upgrades to wells."

2021 Progress: The current Government [continued to fund well upgrades](#) under the Housing (Private Water Supply Financial Assistance) Regulations 2020 (SI No. 192 of 2020). These regulations were passed under the previous Government.

2022 Progress: Under the Rural Water Programme, [grants to upgrade, install and/or improve the water quality of private wells are available](#). Grants are also available for Group Water Schemes from local authorities, provided appropriate conditions are met.

3.1.1. Infrastructure and Capital Programme

3.1.1a. "Retain Irish Water in public ownership as a national, standalone, regulated utility."

2021 Progress: Irish Water remains in public ownership.

2022 Progress: Remains, as above.

3.1.1b. "Ensure that Irish Water is sufficiently funded to make the necessary investment in drinking water and wastewater infrastructure."

2021 Progress: During 2020, Minister Darragh O'Brien announced two stimulus packages for Irish Water, totalling €87 million. The works funded by these packages included the delivery of 67km of new water mains, the replacement of 1,131 lead services, 55 pressure management valves and allowed crews to work to find and fix leaks. Irish Water [estimated that 2.2 million litres of water have been saved a day](#) through find and fix alone from these stimulus packages, enough to provide for population of 17,000 people. However, a recent report from the independent Water Advisory Board, while recognising these significant improvements, stated that progress made on water supplies in need of fixing across the [country went backwards in the second quarter of 2021](#).

2022 Progress: The most recent EPA ["Urban Wastewater Treatment" report](#) (November 2021) stated that *"Ireland must provide substantial and sustained funding for waste water infrastructure to protect our environment and public health and reduce the risk of European Union fines"*. Urban waste discharge is the [main source of pollution in 208 water bodies](#) in Ireland, yet there is nothing in the *'Draft River Basin Management Plan for Ireland'* to address this. There have been no significant increases in wastewater treatment since the PfG. Stakeholders indicated there is a lack of transparency in the figures that Irish Water have presented regarding funding. Under the Water Framework Directive, polluted/impacted waters must be identified. A program of measures must be developed by 2027 to alleviate this, and if these waters cannot be treated, the Member State must explain why. Stakeholders felt Ireland's obligation to comply with this needs to be prioritised.

3.1.1c. "Mandate Irish Water to develop plans to ensure security of supply and sufficient capacity in drinking and wastewater networks to allow for balanced regional development."

2021 Progress: No such plans were made public in 2021.

2022 Progress: Progress is now being made on this commitment. Phase 2 of the National Water Resource Plan is being delivered as a [series of regional water resource plans](#) developed by Irish Water, the drafts of which are being reviewed by the Regulator. However, this was planned prior to the publication of the PFG.

3.1.1d. "The Government will fund Irish Water's capital investment plan for drinking water and wastewater infrastructure on a multi-annual basis and deliver the €8.5 billion funding package committed to in Project Ireland 2040."

2021 Progress: In 2021, [the voted provision](#) to Irish Water by Minister O'Brien's Department was €1.3 billion.

2022 Progress: Under Budget 2022, [€1.459 billion was secured for domestic water services provision](#) by Irish Water.

3.1.1e. "Support take-up of Irish Water's Small Towns and Villages Growth Programme 2020-2024, which will provide water and wastewater growth capacity in smaller settlements that would otherwise not be provided for in Irish Water's capital investment plan."

2021 Progress: While there were individual announcements, such as Carrigallen wastewater treatment plant being [selected for upgrade](#) as part of the Small Towns and Villages Growth Programme, there was little to no public information available on support for this programme.

2022 Progress: €97.5 million was [allocated to Irish Water](#) for this programme, approved by the CRU. In September 2021, [21 additional projects](#) were selected to be upgraded under this programme.

3.1.1f. "Ensure that the Rural Regeneration and Development Fund supports the development of such projects."

2021 Progress: There were no major announcements made detailing the use of this fund in relation to water infrastructure.

2022 Progress: There were no announcements regarding this fund in 2022.

3.1.1g. "Support continued investment in reducing leakage across the network."

Progress: See [Commitment 3.1.1b](#).

3.1.1h. "Fully consider the review from the Commission for Regulation of Utilities to Irish Water's proposed approach to the Water Supply Project for the Eastern and Midlands Region."

2021 Progress: No process of considering this review has yet been made public.

2022 Progress: There is nothing in the public domain regarding this commitment.

3.1.1i. "We will continue to help fund upgrades to domestic wastewater treatment systems, including septic tanks."

AND 3.1.1j. "We will review and work to improve the inspection regime for the 500,000 domestic wastewater systems and incentivise upgrading works."

2021 Progress: In July 2020, the EPA reported the grant scheme for septic tanks had [recently been expanded](#) to cover specific areas where work is being focused to improve water quality under the national River Basin Management Plan, meaning that more people would qualify for a grant.

2022 Progress: Stakeholders expressed concern regarding the eligibility requirements for septic tank upgrades – tanks located in areas of high pollution are not necessarily [eligible for an upgrade](#) and must have been registered prior to the 1st of February 2013. Stakeholders also felt the inspection regime has never been adequate, stating that the EPA review of the inspection plan was poor, and

the plan was not significantly improved. While the [2022-2026 plan](#) aims to increase the number of inspections, SWAN Ireland's [review of this plan](#) stated that all dwellings where wastewater treatment is a detriment to water quality should be inspected.

3.1.1k. "As a very significant user of electricity, we will review the electricity requirements of water and wastewater treatment plants and carry out a series of pilot projects to incorporate onsite renewable energy generation."

2021 Progress: No major announcements were made on either a review or of any pilot projects.

2022 Progress: No announcements on this commitment were made in 2022.

3.1.2. Safety and Standards

3.1.2a. "Ensure that Irish Water progresses works to reduce the number of schemes on the Environmental Protection Agency's (EPA) Remedial Action List."

2021 Progress: As of July 2021, there were 53 public water supplies on the EPA's [Remedial Action List](#). The EPA published the quarterly [Public Water Supplies Remedial Action List](#) in July 2021. This was an increase of one supply compared to January 2020.

2022 Progress: As of January 2022 there are [52 water supplies](#) on this list.

3.1.2b. "Support Irish Water in its programme to remove lead pipes from the public supply."

2021 Progress: A report by the Water Advisory Body [released in January](#) said it is "concerned with the lack of progress by Irish Water during 2020 to replace lead connections, with little progress made".

2022 Progress: The Water Advisory Board noted in [their Q1 2022 report](#) that Irish Water replaced 3,152 lead connections in Q4 2021, ahead of 2021 targets (1,500 replacements). However, the Q1 2022 report also noted that replacement of lead connections must be accelerated, and that the Department of Housing, Planning and Local Government should publish a progress report on the National Lead Strategy. There has been no new regulations on this commitment. However, "[€68.5 million for legacy issues in relation to lead pipe remediation](#)" has been secured under the National Development Plan.

3.1.2c. "Ensure that the State complies with the EU Water Framework Directive"

2021 Progress: The draft 3rd River Basin Management Plan, the main implementation tool /plan of the WFD for 2021-2027, was not published in 2021. This was required to be published by December 22, 2020. While the General Scheme of the Water Environment (Abstractions) Bill had reached pre-legislative scrutiny stage, advice from The Office of Parliamentary Legal Advisers to the Housing Committee concurs with the position of NGOs that the Heads of Bill as presented were not in compliance with the Water Framework Directive (WFD). The 'National Land Use Review' committed to in the PfG, which has the potential to deliver the integrated catchment management approach required to achieve WFD targets, had not commenced in 2021.

2022 Progress: [More than half of Ireland's "rivers, lakes and estuaries" are failing to meet Water Framework Directive status.](#) Nitrate pollution in Irish water bodies has risen significantly primarily due to agricultural activities, with 47% of Irish rivers containing an unsatisfactorily high concentration of nitrates. Total nitrogen and phosphorus loads from rivers to the marine environment have increased [by "26% and 35% respectively since \[the\] 2012-2014"](#) reporting period. Referring to the question of whether all water bodies would be of good quality by 2027 (as stipulated by the Water Framework Directive), NGOs have stated that there is "[no chance of that happening](#)". According to the EPA's [Water Quality Indicators 2020 Report](#), "[continued and sustained investment is needed to address water quality issues from urban waste water](#)" to meet Ireland's

obligations under the WFD. See [Commitment 3.1.2e](#) for more information regarding implementation of the WFD.

3.1.2d. "Expand programmes, including the Agriculture Sustainability Support and Advisory Programme (ASSAP), and work with farmers, industry, and advisory services, to protect and deliver improvements in water quality."

2021 Progress: There has been no publicised expansion of ASSAP.

2022 Progress: While there remains to be no published expansion of ASSAP, one stakeholder commented that it was questionable whether ASSAP adequately addresses water quality issues in the first place. There has been no published water quality data/empirical evidence that demonstrates this program is effective. An [independent review](#) commissioned by the Government and carried out by an independent expert advisory panel stated that "the design of ASSAP is relevant and it is a vital element for addressing the water quality challenges in Irish agriculture". However, this review recommended numerous measures to strengthen ASSAP which do not appear to have been implemented.

3.1.2e. "Launch a new revised and strengthened River Basin Management Plan in 2022, drawing on a collaborative approach between all stakeholders."

2021 Progress: The Department of Housing, Planning and Local Government published a document outlining the Significant Water Management Issues for the third River Basin Management Plan for Ireland for public consultation. This [public consultation](#) closed on 7th August 2020. No plan was published, despite a requirement to be published by 22 December 2020.

2022 Progress: The Draft River Basin Management Plan was published in September 2021. The plan has been [criticized for a lack of ambition and for lacking a central body](#) which will oversee or manage the implementation of this plan. The plan points to policies and measures already in place which are not working as water quality continues to decline. Furthermore, there is no mention of how many water bodies the plan is targeting to achieve good status under the WFD. Lack of policy cohesion between agriculture/forestry and water quality has been described as a "huge issue" by NGO representatives. Forestry operations, which can have a significant cumulative impact on catchment areas, are not addressed in the current plan. Despite the addition of some measures to address nitrate pollution, the plan has been criticized for [failing to adequately address this problem](#). There has been significant pressure from the public to address water pollution, [with over 79% of Irish households rating water pollution as a "very important" issue](#). An NGO representative described this plan as "marginally strengthened" compared to the previous iteration of this plan. However, it was difficult to assess the 'collaborative' aspect of this commitment as the finalized plan has not yet been published.

3.1.2f. "Ensure that Irish Water develops Drinking Water Safety Plans to protect abstraction sources; and reduces public health risks, including Trihalomethane (THMs) exceedances in treatment plants."

2021 Progress: Although Irish Water stated its intention to develop Drinking Water Safety Plans (DWSPs) for all Water Supply Zones by the end of 2021, no such plans were made public in 2021.

2022 Progress: The EPA's "[Drinking Water Quality in Public Supplies 2020](#)" report (2021) anticipates that the transposition of the Drinking Water Directive (due to be transposed into Irish law in January 2023) will place this requirement on a statutory footing. This report also states that 35 public water supplies failed to meet THM standards, a reduction from 46 in 2020. There is currently an [infringement case](#) before the Court of Justice of the European Union due to 30 supply zones failing to meet safety standards for THMs. The European Commission have [welcomed Ireland's progress in](#)

[addressing THM levels](#). However, the Commission also stated that more than three years after the opening of the infringement case, several water supply zones still do not comply with the requirements of the Drinking Water Directive. According to the EPA, there is currently [no water quality standard for microplastics](#) in the Drinking Water Regulations.

3.1.2g. "Continue to support the Local Authority Waters Programme and expand the Community Water Development Fund."

2021 Progress: The Local Authority Waters Programme (LAWPro) launched its Community Water Development Fund 2021 in November 2020. The 2021 fund was [increased to €360,000](#) from €225,000 in 2020.

2022 Progress: The Budget for this fund was increased to €500,000 in 2022. However, this scheme was described as completely oversubscribed by stakeholders with funding remaining insufficient when measured against public interest. LAWPro was also described as understaffed. There are currently 13 Community Water Officers while [a SWAN assessment](#) found at least 46 are required.

3.1.3. Group Water Schemes

3.1.3a. "We will support the National Federation of Group Water Schemes, to ensure that issues of quality and security of supply are addressed."

AND 3.1.3b "We will continue to invest in a multi-annual capital funding programme to improve the quality of drinking water in group water schemes, while protecting water quality."

2021 Progress: In March 2021, [funding of €500,000 was announced](#) to implement targeted drinking water source protection actions in group water scheme catchments as part of the National Federation of Group Water Schemes source protection strategy.

2022 Progress: A review of the funding and supports provided to water schemes in rural communities is [currently underway](#) but is not yet completed and therefore has not been acted upon.

3.1.4. Conservation

3.1.4a. "Implement the recommendations of the Committee on Future Funding of Domestic Water Services in relation to excess use."

2021 Progress: There is no obvious evidence that these recommendations have been implemented.

2022 Progress: There is no evidence that this commitment has been implemented.

3.1.4b. "Advocate at EU level for more water and energy-efficient white goods."

2022 Progress: There is little information available on how the Government has advocated at an EU-level on these issues.

2022 Progress: There is no information available on this commitment.

3.1.4c. "Conduct a feasibility study examining how further assistance can be given to low-income households for the installation of water efficient appliances."

2021 Progress: No such feasibility study has been made publicly available.

2022 Progress: No information about this commitment is available.

3.1.4d. "We fully support the work of the Water Services Innovation Fund, which aims to investigate solutions to promoting greater efficiency in water usage."

2021 Progress: Without the publication of a new Water Services Innovation Fund report, it is difficult to give information on this commitment.

2022 Progress: According to the "[Water Services Innovation Fund Annual Report 2020](#)" (November 2021), the CRU have allowed Irish Water €4 million under the Fund for the period 2020-2024.

3.1.4e. "We will continue to work with An Fóram Uisce (the water forum) to review and develop water-quality strategies."

2021 Progress: No review or development of water-quality strategies has been made public.

2022 Progress: There is no publicly available evidence of An Fóram Uisce's input being integrated into policy.

3.1.4f. "We will commission a range of research projects to explore innovative ways of improving our water infrastructure and reducing consumption."

2021 Progress: There were no major announcements regarding this commitment in 2021.

2022 Progress: There have been no announcements regarding this commitment.

3.2. Marine

3.2a. "Develop a new integrated marine sustainable development plan, as a successor to Harnessing Our Ocean Wealth, focusing on all aspects of the marine, with a greater focus on sustainability and stakeholder engagement and centrally coordinated by the Department of the Taoiseach, to be implemented over the life of the Government."

2021 Progress: There was no obvious progress on such a plan in 2021.

2022 Progress: There is no information in the public domain that this commitment has progressed.

3.2b. "Ensure that inshore waters continue to be protected for smaller fishing vessels and recreational fishers and that pair trawling will be prohibited inside the six-mile limit."

2021 Progress: In October 2020, the High Court ruled that the Policy Directive excluding large vessels from trawling in inshore waters within 6 miles of the coast was void/or of no legal effect. Minister McConalogue brought an appeal against this decision, and, as of March 2021, the Court of Appeal reinstated the Policy Directive until the full hearing of the appeal. The substantive hearing by the Court of Appeal was [due to take place on the 22nd and 23rd June](#).

2022 Progress: Vessels have resumed trawling in the waters inside six nautical miles and no progress has been made with appeals with judgement being reserved. According to [Minister Charlie McConalogue in May 2022](#) - "I am awaiting the decision of the Court of Appeal to inform next steps. As the matter is sub-judice, I cannot comment further until the matter can be resolved before the Courts". The resumption of trawling within the six-mile limit has been highlighted by NGOs such as [Birdwatch Ireland](#) as a critical issue that requires urgent State action.

3.2c. "Aggressively tackle the issue of waste, ghost nets and illegal dumping in the marine environment, through rigorous implementation of the Port Reception Facilities Directives and by requiring all Irish fishing trawlers to participate in the Clean Oceans Initiative, ensuring that plastic fished up at sea is brought ashore."

2021 Progress: In July 2020, it was reported that [96% of Irish trawlers were signed up to the Clean Oceans Initiative](#), and the Government continues to support the initiative. However, there is no clear evidence of participation in this scheme having been made a strict requirement. There is insufficient information available on the implementation of the Port Reception Facilities Directive.

2022 Progress: In June 2022, Minister McConalogue announced the '[Clean Oceans Initiative Fishing Gear Retirement Scheme](#)', where fishing gear could be disposed as part of a free drop-off service. However, this scheme is entirely voluntary. According to stakeholders, industry-led initiatives are also progressing, but it is unclear how these are monitored, if at all. There has been no legislative action to address this commitment. As of April 2022, there are currently *"no incentives in place in*

respect of the use of selective fishing gear or using fishing techniques with reduced environmental impact” according to Minister McConalogue.

3.2d. "Work to develop the aquaculture sector in a sustainable way, including shellfish aquaculture, using native species, and implement the recommendations of the report of the Independent Aquaculture Licencing Review Group, to ensure that feed products for aquaculture are sourced and produced in the most sustainable manner possible."

2021 Progress: Minister McConalogue [announced in July 2021](#) the award of €1 million in grants to 13 aquaculture enterprises under his Department’s European Maritime and Fisheries Fund Programme. However, according to NGO representatives, feed products for aquaculture are not sourced in a sustainable manner, with sprat stocks being cited as poorly managed by being overfished in the last number of years.

2022 Progress: On the 28th of June 2022, the online Aquaculture Information Management System (AQUAMIS) [was launched](#) in line with the [Independent Aquaculture Licencing Review Group’s recommendation](#) to “Develop a data management and information system with online aquaculture licence application and tracking functionality and spatial mapping of aquaculture sites and exclusion areas”. This has been described as Phase 1 of implementing the Review Group’s recommendations. Phase 2 is planned to be delivered [over a 24-month period](#). However, implementation of these recommendations are well overdue as the review was published in 2017. According to AQUAMIS, there are [551 licenced aquaculture sites](#) for pacific oysters. These are classified as an invasive species and are becoming naturalized in Irish bays. [According to Irish ecologists](#), this has the potential to displace native species (including shore birds) and disrupt existing marine habitats.

3.2e. "Progress a national policy on coastal erosion and flooding having regard to climate change."

2021 Progress: The National Coastal Change Management Strategy Steering Group [met for the first time in September 2020](#). The group was intended to report to Government within six months with initial findings and recommendations. No such findings or recommendations were made public in 2021.

2022 Progress: There was no progress on this commitment in 2022. In the Climate Change Advisory Council’s [2021 Annual Review](#), they noted that the Government had committed to the development of a Coastal Change Strategy and established a cross departmental working group to bring this work forward on a whole of Government basis. However, the initial findings and recommendations of the group which were due in Spring 2021 are now overdue.

3.2f. "We will task the Marine Institute with a collaborative EU-wide research initiative, aimed at investigating the climate-change mitigation potential of blue carbon and working towards a means of creating a validated inventory that will in the future assist the EU in meeting our climate-change objectives."

2021 Progress: In June, the Marine Institute [launched a funding call](#) for a major programme of research in the area of Blue Carbon. Funding of up to €1.6m was earmarked for the call to support a large-scale research project to run from 2021 to 2026. The closing date for applications was 2 September, 2021.

2022 Progress: This research is now underway. The successful recipients of funding, ‘BlueC’ and ‘Quest’, were [announced in February 2022](#). These projects have received €2.6 million of funding. However, it remains to be seen whether these projects will have a successful impact.

3.2.1. Common Fisheries Policy

3.2.1a. "We are fully committed to the environmental objectives of the CFP"

2021 Progress: [In the words of the Irish Wildlife Trust](#): "The fishing industry is in a tailspin due to Brexit and allegations of illegal fishing resulting in changes to rules on how fish can be landed. There's a lot of money swishing around and talk of using this to tie up boats. However, there is no talk that this should be done to help end overfishing and stop dumping unwanted marine life, as stipulated in the CFP. If anything, the level of overfishing is getting worse and there is no indication that the Government is planning anything but business as usual." According to one NGO representative, Ireland and the EU have failed to implement the CFP and in particular the obligations to end overfishing by 2020 and end discarding fish by January 2019. This representative stated Ireland has played a negative role at an EU level, contributing to this outcome by advocating for sustainable fishing limits, which the representative defined as overfishing, and by taking insufficient action to ensure that the landing obligation was complied with.

2022 Progress: According to multiple NGO representatives, the CFP has not been implemented properly in Ireland. Birdwatch published a review of the CFP in 2020, entitled "[Common Fisheries Policy 2020 - A Discarded Opportunity](#)", describing Ireland's failure to prevent overfishing. According to NGO representatives, little has yet to be done to address the concerns raised in this review. In February 2022, a CFP Review Group [was announced following a call made by the High Court of Ireland for the Court of Justice of the European Union to decide whether EU ministers have illegally set unsustainable fishing limits, following a case taken by Friends of the Irish Environment](#). The CFP Review Group has undertaken a review of the CFP and its implementation in Ireland and this is expected to be published shortly. From this, recommendations will be made regarding how the implementation of this policy can be improved. While this shows a desire to improve on this commitment, stakeholders were not convinced that this will lead to significant change as there are issues which go well beyond Ireland's borders. The wording of this commitment was also considered to allow the Government to segregate the CFP into environmental objectives and other objectives and ignore the full implementation of this policy.

3.2.1b. "Actively promote setting annual quotas, in line with Maximum Sustainable Yield principles."

2021 Progress: In the opinion of an NGO representative, Ireland played a negative role at an EU level, contributing to the EUs failure to implement MSY principles by advocating for practices which result in overfishing.

2022 Progress: Ireland continues to consistently press for total allowable catches to be above scientific advice, still setting catches in excess for many fisheries and species.

3.2.1c. "Promote the introduction of constructive technical measures that promote sustainability, decrease by-catch and protect fish stocks for the future."

2021 Progress: The Sea-Fisheries (Technical Measures) Regulations 2020 (S.I. No. 440/2020) was enacted in October 2020, giving full effect to the Commission Implementing Regulation (EU) 2020/967. One NGO representative welcomed the fact that Ireland was supporting such constructive technical measures but argued more could be done to ensure that they are implemented as the uptake of certain measures is poor within the industry. However, it was noted that this is partly a broader regional issue within the EU.

2022 Progress: BIM have [triallyed technical measures](#) such as nets with altered mesh sizes for the purposes of improving environmental and economic sustainability. BIM have also published technical guidelines on reducing the number of unwanted catches. However, stakeholders indicate

the extent to which uptake of these measures have been promoted remains questionable, and there appears to be no legislative backing for the use of such measures.

3.2.1d. "Work to eliminate illegal fishing and promote a culture of compliance by all EU vessels in our 200-mile zone, in order to protect the fish stocks on which the Irish fishing industry depends."

2021 Progress: In February, the findings of a formal administrative inquiry undertaken by the European Commission were reported. Auditors found evidence of large-scale overfishing between 2012 and 2016, declaring Ireland's systems for controlling and sanctioning compliance with the rules as "unsatisfactory". They have imposed a "concrete and specific package of measures" to address the failures, including penalties. As a result, Ireland will have [tens of thousands of fish deducted from its quotas](#) and could lose up to €40 million in EU funding. According to NGO representatives, many of the issues remain unaddressed. Land and sea inspections of fishing vessels also dropped by 30% in 2020, with a [drop of over 60% sea boardings](#) by the Naval Service due to Covid-19 redeployment.

2022 Progress: New control regulations have yet to be agreed by the EU. The number of fisheries boardings by the Naval Service has continued to decrease. In 2021, the Naval Service undertook [269 boardings](#) relating to fisheries, resulting in nine detentions, compared to [309 boardings in 2020](#). Illegal discarding continues to be a significant issue in Irish waters. In November 2021, the European Commission [issued a formal notice](#) to Ireland requesting a response regarding how this issue will be tackled. If the response is unsatisfactory, infringement proceedings may be opened.

3.2.1e. "Implement the Sea Fisheries Protection Authority (SFPA) capability review, with a view to enhancing governance issues, and consider any other measures that may be necessary."

2021 Progress: According to [Minister's Questions in April 2021](#), an independent Advisory Board, nominated by DAFM was put in place to assist the management of the SFPA in the implementation of the Report.

2022 Progress: According to a [Parliamentary Question](#) in June 2022, the "advisory board has no legal responsibility and is solely advisory in nature. The responsibility to implement the SFPA capability review is solely with the SFPA, according to the Minister's response. In December 2021, the SFPA published their [three year strategy](#). One of the KPIs under this strategy is to implement the recommendations of the review by the end of 2022.

3.2.1f. "Implement a fair EU points system, in order to protect fish stocks and ensure the release of suspended EU funding."

2021 Progress: In August 2020, [laws were introduced](#) providing the Sea Fisheries Protection Authority with powers to apply penalty points against licenced fishing vessels for serious infringements of the European Common Fisheries Policy.

2022 Progress: The [Sea-Fisheries \(Miscellaneous Provisions\) Act 2022](#) amended the European Union (Common Fisheries Policy) (Point System) Regulations 2020.

3.2.2. Marine Protection Areas

3.2.2a. "We support the principles and ambition of the EU Biodiversity Strategy and will develop comprehensive legislation for the identification, designation, and management of Marine Protected Areas (MPAs) in Irish territorial waters."

AND 3.2.2b. "We will realise our outstanding target of 10% under the Marine Strategy Framework Directive as soon as is practical and aim for 30% of marine protected areas by 2030."

AND 3.2.2c. "This will be done on the basis of scientific expertise and in close consultation with all stakeholders, in particular the fishing industry, as well as environmental and community representatives. This consultation process will begin in the first 100 days of Government."

2021 Progress: There were no MPA designations made under the current Government in 2021. [An expert report on MPAs](#) (initiated under the last Government) was published earlier this year. In the opinion of the Irish Wildlife Trust, new legislation to define an MPA in law is, at best, a year away and, more likely, two years away from enactment. Multiple NGO representatives expressed the opinion that this legislation will be necessary if there is any chance to meet the 30% by 2030 target, asserting that existing [MPAs remain mismanaged while the criteria for deciding where new MPAs should go has yet to be determined](#).

2021 Process: An exceptionally long six-month public consultation on MPAs concluded at the end of July. It is unclear when the outcome of this consultation will be known and, according to NGO representatives, there has been no official timeline given at any point in this process. The content of the MPA Advisory Group report, upon which the public consultation was based, was well-received by NGOs. No discernible action has been taken, despite a number of SACs sitting ready to come under MPA status. One NGO representative raised concerns around the lack of funding that has been allocated to progress research, consultation, designation and management.

2022 Progress: Legislation for the identification, designation, and management of Marine Protected Areas (MPAs) is currently being drafted. Draft legislation is aimed to be published this year, with the legislation enacted early next year. [According to Minister Noonan](#), the target of 30% will be included in this legislation. However, the quality of this legislation is unknown until the draft is published. Stakeholders feel that Ireland is well behind on achieving the targets outlined in this commitment as currently only 2.1% of Ireland's marine and coastal areas are designated as MPAs. The phrasing "as soon as is practical" in this PfG commitment was criticised for not providing any kind of timeline. The [review of the public consultation on the MPA Advisory Group report](#) was published in March 2022, showing overwhelming public support (>99% of submissions) for MPAs.

3.2.2d. "We will examine the establishment of an offshore maritime area as Ireland's seventh national park."

2021 Progress: No major public announcements was made on this commitment in 2021.

2022 Progress: No progress has been made on this commitment.

3.2.3. Marine Planning and Development Management Bill

3.2.3a. "The Government will prioritise the passage of a balanced and Aarhus Convention compliant Marine and Planning and Development Management Bill through the Oireachtas."... "Give cross government priority to the drafting of the Marine Planning and Development Bill, so that it is published as soon as possible and enacted within nine months."

2021 Progress: This Bill commenced under the previous Government and, although progress was quite rapid at the start of the current Government, work slowed in 2021. A Joint Oireachtas Committee session was held in relation to the Bill, with many NGOs attending and giving evidence. Following this, the Committee put forward a number of effective recommendations regarding how the Bill could be improved, specifically around marine protection, as no provisions for MPAs or interim protection for the marine environment had been included. The Marine and Planning and Development Bill was replaced by the Maritime Area Planning Bill, and work it was scheduled to resume on it in Autumn 2021 beyond the nine-month timescale that was committed to.

2021 Outcome: According to an NGO representative, the current Maritime Area Planning Bill, by failing to make provisions for marine protection, could be described as failing to meet the “balanced” criteria the Government committed to in the PfG. It was not known whether the recommendations put forward by the Joint Oireachtas Committee would be incorporated.

2022 Progress: This commitment is now the [‘Marine Area Planning Act’](#) and went through the Oireachtas in December 2021. Several stakeholders expressed concern over the Act’s compliance with the Aarhus Convention. Furthermore, the Act has been criticised for not addressing interim protection of areas before designation. Other concerns within the legislation include the [impact of the planning process on biodiversity and the process of judicial review](#).

3.2.3b. “We will bring forward Ireland’s first ever National Marine Planning Framework. This will introduce a planning system for the development of Ireland’s maritime area in the same way that the National Planning Framework fulfils this function on land.”

2021 Progress: The [National Marine Planning Framework \(NMPF\)](#) was approved by the Dáil on 12th May 2021.

2021 Process: A public consultation on the draft NMPF was launched by the previous Government on 12th November 2019. According to one NGO representative, a minimal number of recommendations put forward by the NGO sector were adopted in the final plan. When the final plan was published, there were calls from NGOs, the fishing sector and opposition parties to allow for more scrutiny of the plan. According to an NGO representative, the Government did not allow this and essentially vetoed the Joint Oireachtas Committee holding a public session on the final NMPF. There was a very brief debate in the Dáil before the NMPF was passed.

2021 Outcome: According to NGO representatives, the NMPF in its current form is not compliant with the EU’s Maritime Spatial Planning Directive.

2022 Progress: The National Marine Planning Framework is now in place as of 1 July 2021. NGOs continue to express significant issues with this framework. SWAN’s report on the NMPF states that this cannot be considered a spatial plan, which is required under the Directive, as this does not [“allocate where activities will take place at sea or set out regionally differentiated priorities for the use and protection of Ireland’s marine space”](#). Furthermore, the plan does not address the volume or intensity of planned activities, which are necessary to conduct assessments of capacity and cumulative impacts and does not take an ecosystem based approach.

3.2.3c. “These two documents will form the basis for Project Ireland Marine 2040, our long-term overarching strategy to manage Ireland’s seas for the benefit of all its people.”

2021 Progress: One out of two of these documents has been finalised and published, meaning that the exact details of this “long-term, overarching strategy” are yet to be set in stone.

2022 Progress: The two documents have been published. However, as highlighted in Section 3.2.3a and 3.2.3b, NGOs have expressed numerous concerns over their quality.

3.2.3d. “A marine planning oversight delivery board on the same model as the Project Ireland 2040 Delivery Board will be established to provide leadership and oversight to the implementation of these policies.”

2021 Progress: While there is reference to this Delivery Board in the National Marine Planning Framework, there have been no public reports of any appointments, meetings and action taken by the board to date.

2022 Progress: The Maritime Area Regulatory Authority is aimed to be [established and operational from next year](#). According to Deputy Ossian Smyth, *“The establishment of this authority is one of the highest priorities for the Government”*.

4. Circular Economy & Waste

4a. "Publish and start implementing a new National Waste and Circular Economy Action Plan."

2021 Progress: The [Waste Action Plan for a Circular Economy](#) was published in September 2020. The plan outlined 200 actions intended to reduce waste and move towards a circular economy.

2021 Process: A working group was established, with five seats in this groups being occupied by the environmental NGO sector. NGO representatives were positive about both this level of representation and the working group process itself.

2021 Outcome: Not all of the 200 actions were expected to be implemented in 2021, but the aim is rather to implement them over the life of the Government. In the opinion of one NGO representative, the wording of some of these actions was rather weak, using phrasing such as “we will endeavour to”. The waste advisory group that was established last year to help devise the Waste Action Plan is now going to fulfil the role of the Circular Economy Advisory Group. According to one NGO representative, the retention of this advisory group should contribute to the proper of implementation of the various regulations and legislation that are coming forward and help to push for full Government compliance with all 200 actions.

2022 Progress: The Whole of Government Circular Economy Strategy 2022 – 2023 '[Living More, Using Less](#)' was published in December 2021. DECC then committed to immediately begin work on the 2nd iteration of this strategy, which is currently being developed. The [Circular Economy and Miscellaneous Provisions Act 2022](#) was signed into law on the [22nd July 2022](#). This Act “*defines the Circular Economy for the first time in Irish domestic law*”. This Act will also give effect to some of the legislative commitments in the PfG and in the Waste Action Plan. For example, one of the most significant commitments in the Waste Action Plan regarded the application of incentivised pricing to commercial waste, passing on responsibility for EU target attainment to collectors. This will be achieved by introducing [mandatory incentivized pricing to all commercial waste customers](#), which means that segregation does not just take place for household waste, but also for commercial waste.

4b. "Strengthen the Extended Producer Responsibility (EPR) model (for packaging), to ensure the coverage of the full net costs related to the separate collection and treatment of the end-of-life products."

2021 Progress: A strengthening of the EPR model was expected in the Circular Economy Bill. The heads of the regulation were completed in 2021, and the final proposed regulation was expected by the end of 2021. One element that was to be put into place is eco-modulation, whereby producers who produce more single-use packaging would be obligated to contribute more to Repak, while those who shift to recyclable packaging would pay less. Under the Single Use Plastics Directive, transposed into Irish law on 2 July, EPR schemes for various single use items will come into effect from 31 December 2024. The funds from these schemes will go towards covering the cost of litter clean-up and public bin management.

2022 Progress: Additional enforcement provisions around EPR, including fixed payment notices, are being delivered through the Circular Economy and Miscellaneous Provisions Act 2022. Work is also underway to [amend packaging regulations](#) to ensure that ‘self-compliance’ is removed as an option. Additional EPRs will arise from the Single Use Packaging Directive, which imposes implementation of extended EPRs by 5th of January 2023, such as the ban on microplastics which targets plastics found in cigarette butts, among other sources. More EPR’s are expected to be put into place through a regulation rather than a Statutory Instrument. According to [a government announcement](#), by 31 December 2024, producers of balloons, wet wipes and fishing gear will also be subject to an EPR scheme. However, stakeholders wish to see EPR’s extended to not only plastic, but all packaging. While there has been a shift towards compostable packaging, this still litters the environment if not disposed of correctly.

4c. "Consider ways in which we can better inform consumers about the carbon footprint of products, including through labelling."

2021 Progress: In the Waste Action Plan for a Circular Economy, the Government states its intention to "work to encourage the rollout and mainstream adoption of my waste package labelling." However, no apparent action was taken on this commitment in 2021.

2022 Progress: According to a Government representative, DECC is working with the Department of Enterprise to develop Ireland's negotiating position on the European Commission's Sustainable Products Initiative. The two departments believe this is the most effective route to ensure customers are informed about the environmental impact of products. However, it is currently unknown what form this will take in terms of legislation. NGO representatives expressed concern over lack of progress in this area.

4d. "Ensure that public procurement leads the transition to the Circular Economy through an evidence-based approach, such as relying on Environmental Product Declarations. We will mandate the inclusion of green criteria in all procurements using public funds, to be completed within 36 months."

2021 Progress: The Waste Action Plan for a Circular Economy lays out seventeen measures intended to strengthen and expand the usage of Green Public Procurement in Ireland.

2022 Progress: The existing 'Green Tenders' document on Green Public Procurement is [being reviewed](#). According to a Government representative, there has been a targeted pre-consultation process with relevant departments and stage agencies. This will be drafted in the second half of this year with a view to go to public consultation by the end of the year. In this document, the commitment to have green public procurement in all public expenditure will be operationalized as much as possible. This document is aimed to be published by the end of 2022. According to the ["Whole of Government Circular Economy Strategy 2022 - 2023"](#), DECC is working with the OGP and the EPA to update all procurement frameworks within the next three years. In addition, The EPA's 'Green Public Procurement - Guidance for the Public Sector' document was published in September 2021 as a 'rolling document'. According to the EPA's website, an online training program for green procurement is currently being developed. Furthermore, action 58 of the NCAP21 Annex states the Government will *"Mandate the inclusion of green criteria in all procurements using public funds, introducing requirements on a phased basis, and providing appropriate support to procurers"*. The specified outputs include a 'Report on Green Public Procurement activity during 2020' ([published by the EPA in April](#)) and the delivery of an 'Up skill programme to enable suppliers to respond to green criteria within public procurement'. The Circular Economy, Waste Management (Amendment) and Minerals Development (Amendment) Bill 2022 states *"For the purposes of the development of the circular economy, the circular economy strategy shall promote the use of criteria relating to the circular economy in public procurement"*. Some stakeholders felt the word 'promote' was too weak and only one sentence on public procurement was an insufficient commitment.

4e. "Work with EU Member States to encourage the further reduction and prevention of plastic packaging."

2021 Progress: Regulations giving effect to the provisions Single Use Plastics (SUP) Directive were signed into law by Minister Eamon Ryan on 2 July 2021.

2021 Outcome: The Rethink Plastic Alliance and the Break Free From Plastic movement have [released an assessment](#) of each EU Member States transposition of the SUP Directive, reaching the conclusion that "no measure was overlooked" by Ireland.

2022 Progress: There are some elements of the SUP Directive which are currently awaiting guidance from the European Commission. According to a Government representative, Ireland has pushed the Commission to be ambitious during recasting the new regulations around packaging. The Circular

Economy and Miscellaneous Provisions Act 2022 puts Ireland ahead of other Member States regarding regulations on single-use plastics. Ireland is on track with the requirements of the SUP Directive but has not exceeded those requirements yet. However, the Circular Economy Act does put forward measures such as the 'latte levy' to help meet prevention and reduction targets, and this will position Ireland as one of the frontrunner Member States in using economic instruments to reduce plastic waste. In a [Seanad debate of the Circular Economy Bill](#) on the 14th June 2022, Deputy Ossian Smyth (Green Party) stated *"We are providing legislation that allows for any type of packaging - for food, drink or anything else - to have a levy on it only where there is a reusable alternative."* According to an NGO representative, the latte levy will effectively be a pilot scheme, which could then be expanded into other disposable beverage cups and types of packaging. An NGO representative also stated that the Government are currently considering a regulation to reduce the use of disposable cups in arenas, which is intended to pass by the end of the year.

4f. "Continue and expand the Clean Oceans Initiative to collect, reduce and reuse marine litter and clean up our marine environment."

2021 Progress: Although Minister McConalogue [announced in June 2021](#) that over 600 tonnes of marine waste had been collected by Ireland's seafood sector since 2015 as a result participation in the Clean Oceans Initiative, there was no obvious evidence of any major expansion of the scheme's scope in 2021.

2022 Progress: On the 8th of June 2022, Minister Charlie McConalogue of the Department of Agriculture, Food and the Marine announced the ["Clean Oceans Initiative Fishing Gear Retirement Scheme"](#), aimed at collecting old and damaged fishing gear. However, this scheme is entirely voluntary and it remains to be seen what impact this initiative will have.

4g. "Examine changes to the tax system to encourage the efficient use of resources."

2021 Progress: A latte levy is expected to be in place by 2022. However, further economic instruments such as a levy on takeaway and zero VAT for the reselling of used items or for repair services were cited as further areas of development by one NGO representative.

2022 Progress: A 20c levy on disposable coffee cups has been introduced under the Circular Economy Act (see [Commitment 4e](#)). The NGO 'VOICE' have pushed for zero VAT on repair services but have been unsuccessful in this effort to date. While this was [discussed by the Joint Oireachtas Committee on Climate Action in October 2021](#), it was not taken up by the Department of the Environment, Climate and Communications. According to an NGO representative, this may instead be the responsibility of the Department of Finance under an upcoming Finance Bill.

4h. "Create a Circular Economy Unit in Government, to ensure a whole-of-government approach to the circular economy."

2021 Progress: A Circular Economy Unit has been established in the Department of Environment, Climate and Communications (DECC).

2022 Progress: Two circular economy divisions have been created. --Circular Economy Strategic Economy Division (responsible for the circular economy strategy and the circular economy bill) and the Circular Economy Materials Management division (focused on material streams specifying actions to lower material consumption rather than finding solutions to waste that arises from material consumption). According to a Government representative, there has been a larger focus on this commitment in 2022, with the aim of moving up the waste hierarchy beyond recycling and into reuse and reduction.

4i. "Phase out the use of single-use plastics."

2021 Progress: The transposition of the SUP Directive required that plastic bottles have tethered lids and caps from 3 July 2024. Plastic bottles must also be made of at least 25% recycled plastic by 2025 and at least 30% recycled plastic by 2030. Bans on non-medical wet wipes, single-use sachets and hotel toiletries are planned in 2022. According to an article published by VOICE Ireland in 2021, reduction targets were being considered for packaging and overpackaging to significantly reduce single-use plastics being placed on the market by 2026, with draft legislation due later in 2021. A latte levy was [expected to be in place as of 2022](#) to incentivize the reduction of single-use cups as well as a ban for restaurant use of disposable cups, before a full ban on disposable cups enters in force in the longer run.

2022 Progress: Government focus has now moved beyond single use plastic towards single use disposable agents and prioritising the use of reusable products (see [Commitment 4e](#)). Under the Circular Economy Act, the Minister must set re-use and repair targets. VOICE have stated that they are [looking for stronger provisions](#) to ensure that "ambitious sectoral reuse and repair targets are set and that there is a strong monitoring, reviewing and reporting element to ensure that actions are actually having impact". The latte levy is planned to be rolled out at the end of 2022. The waste recovery levy is hoped to be introduced later this year, with public consultation and impact analysis planned Q3/Q4. according to a Government representative. VOICE Ireland have called for non-medical wet wipes, single-use sachets and hotel toiletries to be added to the list of banned items. [Despite support from the Joint Committee on Environment & Climate Action](#), no progress appears to have been made regarding the banning of these items. There any no publicly available data regarding progress for tethered lids and recycled plastic for bottles.

4j. "Examine the potential of a municipal compost system for biodegradable packaging."

2021 Progress: No announcements were made in 2021 regarding this commitment.

2022 Progress: No progress appears to have been made regarding this commitment.

4k. "Intend to introduce a deposit-and-return scheme for plastic bottles and aluminium cans, in line with the findings of the recently commissioned report."

2021 Progress: A national deposit-and-return scheme for both PET bottles and cans underwent consultation and is [expected to be in place by the end of 2022](#) to achieve the 90% collection target.

2022 Progress: The Government aims to have this scheme [operational by Q3 2022](#). Awareness raising, designing of IT infrastructure, acquisition of reverse vending machines, and registering retailers and producers will be managed by the scheme operator, according to a Government representative. This is not a pilot scheme and all vending machines are expected to be rolled out at the same time. VOICE Ireland have [strongly criticised](#) the Department of Finance's plan to introduce VAT on the DRS, stating that it "sets a bad precedent" and "may defeat any new reuse system".

5. Air Quality

5a. "We will publish the first ever clean air strategy."

2021 Progress: The clean air strategy was not published in 2021, despite a consultation being completed back in 2017. Minister Ryan stated [during Minister's Questions](#) on 1 April 2021 that his department is currently working to finalise this.

2022 Progress: The clean air strategy has not been completed. Submissions for the 'Consultation on the Clean Air Strategy for Ireland' [closed on 3 May 2022](#) and the submissions are intended to be published in September 2022. This process of monitoring air pollutants, assessing air quality, and determining the effects on human health started in 2016/2017 and has still not reached a final stage.

Stakeholders have expressed concerns that the strategy will be outdated by the time it is finally published.

5b. "Develop a regional approach to air quality and noise enforcement."

2021 Progress: The Environmental Protection Agency [contracted CERC to undertake regional-to-local scale air quality modelling for Ireland](#) to generate air quality maps for the whole country. There was no obvious progress on devising a regional approach to noise enforcement.

2022 Progress: A regional approach to air quality [is currently being developed with local authorities](#), and a budget has been allocated to them to hire additional staff for this purpose. This approach is planned to be completed by September, according to a government representative. An EPA report was commissioned in November 2020 [to provide an emissions inventory for the five main cities \(Dublin, Cork, Limerick, Waterford and Galway\)](#) creating a local approach to air quality monitoring. However, small towns like Ennis, Macroom, Tralee and Enniscorthy are not covered despite being [some of the most highly polluted areas in Ireland](#). While studies may be underway, no results are publicly available to assess the modelled air quality and resultant maps. According to an academic expert, several stand-alone research projects are active regarding urban and regional air quality modelling relevant to Ireland. However, a coherent regional plan to assess air quality does not yet exist. There has been no obvious progress on devising a regional approach to noise enforcement.

5c. "Develop a multi-agency approach to clamping down on the sale of high-sulphur content fuel imported from the UK, with local authorities and the Revenue Commissioners involved"

2021 Progress : No announcements were made on the development of such a multi-agency approach.

2022 Progress: The Solid Fuel Regulation, agreed upon [the 14th July 2021](#), will lower the permitted sulphur content of these fuels from 2% to 1% by 1 September 2025. The Air Pollution Act (1987) currently provides legislation for local authorities alongside the EPA to enforce localised bans on the selling and burning of high-sulphur content solid fuel. However, [few prosecutions have been made by local authorities for selling](#) and none for burning in people's homes. Furthermore, the trafficking of smoky, solid fuel from Northern Ireland and other European countries is currently not policed. Between the 1st January 2021 and July 2021, [36,714 tonnes of peat was imported from Northern Ireland alone](#). According to an academic expert, a multi-agency approach to solving this problem is not currently in operation and this will likely require the replacement of the Air Pollution Act with a Clean Air Act.

5d. "Invest in our network of monitoring stations, to provide scientific evidence of air quality across different parts of the country, including real-time and localised air quality information."

2021 Progress: In August, Minister Ryan stated that an expansion of the air quality monitoring network was scheduled during 2021 and 2022 to include another 15 stations, increasing the total number to 110. A network of real-time air quality monitoring is [expected by 2024](#).

2022 Progress: There are currently [90 monitoring stations](#) providing data that is readily available to the public. As above, [further expansion of the national air quality monitoring network \(EPA AAMP\) is scheduled](#) during the period up to 2024. This will increase the total number to 110 stations, making this the highest level of monitoring per capita in Europe. This also aims to provide near real-time data. However, plans for this network were in place before the publishing of the PfG.

5e. "Extend the Smoky Coal ban to new towns and, over the term of Government, move towards a full nationwide ban."

2021 Progress: From 1 September 2020, the burning, sale and marketing of smoky coal has been prohibited in thirteen additional areas across the country. There was a public consultation on the

development of new Solid Fuel Regulations and the Clean Air (Smoky Coal Ban) Bill 2021 which went before Seanad Éireann in 2021.

2022 Progress: A full nationwide Smoky Coal Ban was planned for 1 September 2022. In July 2022, the [Government agreed new regulations on solid fuels](#). The primary focus of the draft regulations is on the large-scale, commercial sale of smoky fuels, including smoky coal, turf and wet wood as the fuels proven to be a major contributors to air pollution in Ireland. The regulations are being submitted to the European Commission under the Technical Standards Directive (2015/1535) notification procedure, following which the regulations will come into effect nationally on 31 October 2022.

6. Transport

6a. "Use a range of policy approaches to incentivise use of electric vehicles (EVs) and encourage a shift away from petrol/diesel vehicles."

2021 Progress: In April 2021, it was announced that the Sustainable Energy Authority Ireland (SEAI) Electric Vehicle Purchase Scheme had been refocused to prioritise battery electric cars. Grants for these EVs continued at a rate of €5000 whereas, on the 1st of July 2021, the value of the purchase grant for Plug-In Hybrid Electric Vehicles (PHEV) [changed from €5,000 to €2,500](#).

2022 Progress: In November 2021, the Department of Transport published their '[EV Policy Pathway Report](#)', which outlined measures to increase the uptake of EVs. Grants of up to €5,000 were maintained for BEVs - the purchase grant for PHEVs has now been removed to encourage greater uptake of BEVs. [A home charger grant of up to €600, lower motor tax, and reduced tolls](#) are among other current incentives to increase EV ownership. [In July 2022, Minister Eamon Ryan announced a suite of grants and initiatives](#) which will make it easier for people and businesses to make the switch to electric vehicles (EVs) during the launch of Zero Emission Vehicles Ireland, a new dedicated Office to oversee Ireland's transition to zero emission vehicles. Among them is a new apartment charging grant; an expansion to the home charger grant; a new trial to promote and encourage the electrification of the commercial fleet; and new funding for sports clubs to install a network of publicly accessible chargers.

6b. "Legislate to ban the registration of new fossil-fuelled cars and light vehicles from 2030 onwards and phase out diesel and petrol cars from Irish cities from 2030."

2021 Progress: While media reports on the drafting of such legislation have been circulating since 2019, no Bill was made public in 2021.

2022 Progress: According to academic and NGO sources, there has been no progress on this as it cannot be done unilaterally and needs to be done on an EU level. According to an academic expert, the EU is planning to legislate a ban on new fossil fuel car registration in 2035.

6c. "Review the current motor taxation regime to ensure that it adequately captures the harm caused by NOx (nitrogen oxide) and SOx (sulphur oxide) emissions. This will only apply to newly registered vehicles."

2021 Progress: Budget 2021 adjusted the nitrogen oxide (NOx) surcharge bands so that higher NOx emitting vehicles pay more. No SOx surcharge has yet been introduced.

2022 Progress: No additional progress has been made and current measures are not enough to disincentivize the purchase of high emission vehicles. [Almost 55% of vehicles purchased in 2021](#) were SUVs, and as of the 4th June 2022, [58% of newly purchased vehicles were SUVs](#).

6d. "Publish an EV strategy to ensure that charging infrastructure stays ahead of demand and provide planning guidance to local authorities."

2021 Progress: There was minor progress, such as Minister Ryan's announcement of funding for Louth County Council and Dublin City Council under the local authority public charge point scheme, which will see an [additional 29 charge points](#) rolled out for public use. ESB ecars is currently undertaking a [€20m programme](#) to expand and enhance the charging network across Ireland which is part funded by Climate Action Fund. However, there were no announcements made regarding the publishing of an overall EV strategy.

2022 Progress: A public consultation on the Electric Vehicle (EV) Charging Infrastructure Strategy 2022-25 was published 5 May 2022 and is now closed for consultation. 100 million has been allocated in Budget 2022 to develop the charging infrastructure outlined in the strategy. However, academic experts described the draft as an "awful strategy" which lacked ambition. [The 2022-2025 strategy focuses on how charging infrastructure can be improved in Ireland, which will be followed by an updated strategy to be published for 2026-2030](#), which will focus on reviewing progress, reassess provisions, initiatives, and funding pathways. The response of the Irish Electric Vehicle Owners Association expressed dissatisfaction [with the speed of this commitment, stating various fundamental flaws within the Infrastructure Strategy](#) such as: the modelling does not recognise that all EVs will require enroute charging, it is incorrect to assume that all EVs are fully charged at the beginning of every journey, the analysis does not recognise the demand for enroute charging by tourists, and the analysis lacks fundamental data on queues at charging points.

6e. "Publish a public procurement framework for EVs. By at least 2025, we will only allow public sector bodies to purchase low or no-emissions cars and light goods vehicles."

2021 Progress: In August 2021, the revised Clean Vehicles Directive was transposed into Irish law by [S.I. 381 of 2021](#).

2021 Outcome: [Under these new rules](#), by 2025, 45% of buses and 10% of trucks procured by public bodies must be "clean" vehicles, with those targets rising to 15% and 65% respectively by 2030. For lighter duty vehicles (LDVs) the target is 38.5% from 2025. [Until January 2026](#), the Government will regard a 'clean' light-duty vehicle as being one with a maximum 50g/km CO2 emissions, and one that hits an 80 per cent score on its Real World Driving Emissions (RDE) standards. From January 2026, that CO2 figure for 'clean' cars will drop to 0g/km, suggesting that the plan is for the Government, civil service, and related state and semi-state bodies to go fully electric for vehicle procurement from then. There have also been one-off measures, such as December's announcement that the NTA was commencing the procurement process for up to [800 double-deck battery electric buses](#). In collaboration with government departments/agencies, semi-state organisations and several local authorities, the CCMA EV Working Group published the ["Local Authority Electrification of Fleet and EV Charging Guidance Document"](#) on the 1st August 2021; which provided information, guidance, and recommendations when considering fleet electrification and the installation of fleet and public electric vehicles (EV) charge points.

2022 Progress: The public procurement framework for EVs is expected to be completed by the end of 2022 as stated in the Climate Action Plan 2021. A representative from the Government confirmed work on this is ongoing and expected to be completed on time.

6f. "Require that all new urban buses be electric hybrid or electric."

2021 Progress: There were no announcements regarding urban buses mandated to be electric hybrid or electric. The legally binding targets for all urban and non-urban buses, as set under the transposed Clean Vehicles Act, are 45% clean vehicles by 2025 and 65% clean vehicles by 2030.

2022 Progress: Significant progress has been made on this commitment in 2022. The procurement

process for the 800 new electric buses has been agreed, with the [first 120 ordered in June 2022](#). A Government representative stated that all new bus purchases will be electric.

6g. "Legislate for e-scooters and e-bikes."

2021 Progress: E-scooters and e-bikes will be legislated for under the [Road Traffic \(Amendment\) \(Personal Light Electric Vehicles\) Bill 2021](#), which went before the Dáil, Second Stage in 2021.

2022 Progress: This Bill is still in the second stage of the Dail and is expected to be signed into law in 2023. Experts and businesses [expressed dismay](#) at this delay in progressing this legislation. However, the Government has [approved a new Road Traffic Bill](#) which legislates, for the first time, the use of e-scooters and e-bikes on Irish roads. In August 2022, [the Irish Times reported](#) the Government had confirmed that electric bikes and e-scooters will be exempt from registration, tax or insurance if they not able to travel at speeds above 25km/h through the [Road Traffic and Roads Bill](#).

6h. "Publish and implement a 10-year strategy for the haulage sector focused on improving efficiencies, standards, and helping the sector move to a low-carbon future."

2021 Progress: [The ten-year Strategy for the Haulage Sector First Consultation Document](#) was published on 9 April 2021, with submissions on the strategy due by 16 July 2021. In addition, the Alternatively Fuelled Heavy Duty Vehicle Purchase Grant Scheme was [launched in March 2021](#). The Scheme was intended to assist the purchase of heavy duty vehicles (HDVs) that are alternatively-fuelled and exceed applicable European Union (EU) environmental standards.

2022 Progress: The 10-year strategy is [still being developed](#) as of December 2021. However, there is no publicly available information on progress. The Alternatively Fuelled Heavy Duty Vehicle Purchase Grant Scheme [re-opened for applications](#) on April 14th 2022.

6i. "Review and reduce speed limits, where appropriate, to address both road safety issues and carbon emissions, and ensure greater compliance."

2021 Progress: Transport Infrastructure Ireland (TII) commissioned work to project the impact of changing speeds and varying speed limits on greenhouse gas emissions and pollutants. The greenhouse gas emissions findings from this workstream informed the wider transport emission analysis underpinning the Climate Action Plan development and [were shared with McKinsey & Company](#) to assist in their work on the development of the Climate Action Plan 2021.

2022 Progress: A review of speed limits is in progress with the Joint Oireachtas Committee on Transport and Communications [undertaking a discussion](#) on this topic in March 2022.

6j. "Run a pilot to examine the potential for ride-sharing apps to improve rural connectivity."

2021 Progress: No announcements were made on this commitment with Covid restrictions potentially delaying progress.

2022 Progress: No progress appears to have been made on this commitment.

6k. "Continue to support the greening of the taxi fleet and continue to provide financial assistance to taxi drivers switching to battery electric vehicles and plug-in hybrid electric vehicles."

2021 Progress: In February 2021, Minister Ryan [announced the expansion](#) of the Electric SPSV (eSPSV) Scheme for Small Public Service Vehicles (SPSVs) such as taxis and hackneys.

The scheme increased from €1m in 2020 to €15m in 2021. As part of the existing scheme, drivers can apply for an electric taxi grant of up to €10,000 towards the purchase of a new full battery eSPSV with a further €2,500 available to convert it to a wheelchair accessible model. Those scrapping older, more polluting, or high mileage vehicles are now eligible for double the normal grant if they make the switch to electric with €20,000 available for a new full electric or €25,000 for a wheelchair accessible new battery electric vehicle.

2022 Progress: This scheme is [in place and underway](#), with the same support as 2021. However, NGO and academic representatives expressed concern over the pace of implementation and that not enough was being done to encourage taxi drivers to make the switch. The requirement for all taxis to be wheelchair accessible was one possible obstacle to implementation due to the lack of EV wheelchair accessible vehicles on the market. Lack of battery guarantees and fast EV chargers restricted to taxi use were two other obstacles identified by stakeholders.

6l. "Support EU and international action to reduce aviation emissions, in line with the aims of the Paris Agreement and the UN Framework Convention on Climate Change."

2021 Progress: In 2021, it was too early to gauge whether the Government would support any EU or international action to reduce aviation emissions. According to one NGO representative, the Government of Ireland had yet to take any concrete position on the aviation reforms laid out in the EU's proposed Fit for 55 package, instead preferring to wait until the full legislation is published to determine their response.

2022 Progress: No apparent progress on this commitment. Ireland [endorsed the concept](#) of green aviation at COP26. However, it is currently unknown what the proposed measures will be to reduce aviation emissions, therefore comment cannot be made on their effectiveness. [Multiple protests](#) were staged by environmental action groups during COP26, stating that the concept of green aviation is unrealistic.

6.1. Cycling and Walking

6.1a. "Each local authority will be immediately mandated to carry out an assessment of their road network, to see where space can be reallocated for pedestrians and cyclists. This should be done immediately."

2021 Progress: No such mandate has been made public.

2022 Progress: Progress has been made at a national level and road space has been allocated. There has been a recruitment drive by local authorities for active travel specialists. It is difficult to quantify progress due its piecemeal nature. In 2022, [€289 million was allocated](#) for local authorities to develop more walking and cycling infrastructure this year which will contribute to 1000km of new or improved walking and cycling infrastructure in Ireland by 2025. The 2022 funding will go towards walking and cycling projects in Clontarf to the city centre route in Dublin, MacCurtain Street in Cork and O'Connell Street in Limerick, among others.

6.1b. "The Government's commitment to cycling and pedestrian projects will be set at 20% of the 2020 capital budget (€360 million) per year for the lifetime of the Government."

2021 Progress: Budget 2021 provided for a [€360 million investment in walking and cycling](#). This was intended to support major projects in all main cities, increased funding for greenways (now €50 million) and the roll out of the Safe Routes to School Programme.

2022 Progress: According to Budget 2022, the €360 million investment is being maintained with money being spent and work progressing to various degrees across the local authorities. One expert felt there needed to be a better system in place to allow more effective active travel infrastructure development across the country.

6.1c. "Deliver a five-year, multi-annual funding programme linked with a specific target of new separated cycling and walking infrastructure, which will be delivered or under construction by the end of 2024."

2021 Progress: In 2021, it was too early to provide information on progress on this commitment.

2022 Progress: As this commitment is not planned to be delivered until 2024, it is still too early to assess.

6.1d. "Mandate that every local authority, with assistance from the National Transport Authority (NTA), adopts a high quality cycling policy, carries out an assessment of their roads network and develops cycle network plans, which will be implemented with the help of a suitably qualified Cycling Officer with clear powers and roles."

AND 6.1d. "Expand and enhance the expertise on active travel needed to dramatically improve infrastructure and participation both in the NTA and local authorities, including by establishing Regional Cycle Design Offices, co-located in the seven Regional Design Offices for roads, to support local authorities."

2021 Progress: An announcement from the Government in June detailed funding for [248 new staff in local authorities](#). It was expected that up to 218 staff could ultimately be assigned to new active travel teams across all local authorities with a further 30 additional staff available through the Regional Design Offices. Minister Ryan requested that local authorities ensure that as part of the development of these teams that each would include an Active Travel Officer dedicated to behavioural change and promotional activity.

2022 Progress: Progress on this commitment is happening within some local authorities, though there is an imbalance of implementation across the country and limited publicly available information regarding the Regional Cycle Design Offices. A Cycle Design Office (CDO) was established by the NTA in 2019 with the core objective being to assist in the [delivery of cycling projects in the Greater Dublin Area \(GDA\) and regional cities](#). The focus is currently on Dublin City Centre schemes and piloting the design and delivery of the Protected Cycle Lanes programme across GD. Stakeholders indicate there is an inconsistency of standards for cycling policy across the country. While two guideline manuals (DMURS and the National Cycling Manual) are available, it is difficult to enforce standards at local level.

6.1e. "Dramatically increase the number of children walking and cycling to primary and secondary school by mandating the Department of Transport to work with schools across Ireland, local authorities, the Green-Schools programme and local initiatives, including Cycle Bus and School Streets."

2021 Progress: The Safe Routes to School (SRTS) Programme to support walking and cycling infrastructure for primary and post-primary schools was announced in March 2021, with 932 schools expressing interest.

2021 Outcome: [170 schools were ultimately selected for the scheme](#), with the remainder planned to roll over into next year's selection cohort. This indicates that, although there was substantial demand from schools for programmes to increase cycle and walking rates, this demand was not being met.

2022 Progress: Not much progress has been made since last year due to capacity issues. There is a goal to develop routes for [761 schools](#) over the coming years. However, that still leaves out 171 schools who expressed interest in the programme. In Galway, three additional routes were added which now covers one third of all primary schools in Galway city and these routes are a combination of on-road, cycle tracks, and the canal network.

6.1f. "Widen the eligibility of the Bike to Work scheme. We will provide an increased proportionate allowance for e-bikes and cargo bikes."

2021 Progress: E-bikes were added to the Bike to Work, aiding employees in [purchasing e-bikes with a maximum value of €1500](#). However, cycling organisations argue this cap was too low, as the average price of an e-cargo bike well exceeds €1500. The eligibility of regular bikes in the scheme

was widened from bikes worth a maximum of €1000 to bikes worth a maximum of €1250.

2022 Progress: The Bike to Work scheme continues to include e-bikes and cargo bikes. However, the eligibility of the scheme has not been widened.

6.1g. "Ramp up the Cycle Right programme to ensure that all children are offered cycling training in primary school."

2021 Progress: No obvious ramping up of the Cycle Right Programme.

2022 Progress: The Cycle Right programme continues to exist but no evidence is available regarding it being ramped up.

6.1h. "Conduct a review of road traffic policy and legislation to prioritise the safety of walking and cycling."

2021 Progress: No official review has been published or announced.

2022 Progress: [A ten year road safety strategy was launched on the 5th December 2021](#). This fifth National Road Safety Strategy (2021-2030) includes ambitious targets and a large investment in road safety during the first phase action plan to 2024. This strategy emphasises the need for behavioural change regarding active travel in Ireland by prioritising sustainable forms of transport such as walking, cycling, and the use of public transportation. This includes: Over the period 2021 to 2025, 1,000km of segregated walking and cycling facilities to be constructed or under construction on the national, local, and regional road network, to provide safe cycling and walking arrangements for users of all ages. Additionally, a review of road traffic policy and legislation to prioritise the safety of walking and cycling will be conducted.

6.1i. "We will lead the development of an integrated national greenways strategy."

2021 Progress: There were no announcements in 2021 regarding a new national greenways strategy. However, funding of €63.5m for Greenways in 2021 was [confirmed by Minister Ryan in 2021 and Minister Naughton in November 2020](#).

2022 Progress: A diverse multi-stakeholder working group (including members of the Department of Transport) developed a [Code of Best Practice for National and Regional Greenways](#) which addressed all elements of a Greenway Project, from inception to completion. However, no integrated national greenways strategy has been launched.

6.1j. "Work with local authorities and appropriate agencies to continue developing an integrated national network of greenways to be used by commuters, students, leisure cyclists and tourists."

2021 Progress: While the network of greenways is certainly expanding, many of these greenways, such as the proposed Kerry Greenway, are not routed into major towns. This decreases the level of greenway integration within the broader transport infrastructure.

2022 Progress: This is underway - several areas around the country (such as [Sligo/Leitrim](#) and [Limerick](#)) have received funding for greenways. According to the Department of Transport, [Funding of around €60 million is being allocated to 40 greenway projects in 2022 "in nearly every single county"](#). An extensive list of projects sorted by project stage can be found [here](#).

6.2. Transport Infrastructure

6.2a. "The Government is committed to a 2:1 ratio of expenditure between new public transport infrastructure and new roads over its lifetime. This ratio will be maintained in each Budget by the Government. In the event of an underspend on roads, this will not impact on public transport spending."

2021 Progress: While this commitment was intended to be fulfilled over the lifetime of the Government, in the Government's first budget in 2020, [€3.5bn was allocated to the Department of](#)

[Transport, 51% of which was allocated for “sustainable transport”](#) including walking and cycling infrastructure, carbon reduction programmes, greenways, and public transport.

2022 Progress: The 10-year National Development Plan has an overall budget of [€165bn with transport projects worth €35bn planned up to the end of the decade](#). A stakeholder commented that the amount of money allocated to roads dwarfs what is spent on sustainable transport. However, it is difficult to define what sustainable transport is and the commitment only refers to this Government’s “lifetime”. While stakeholders felt this commitment could be delivered on, they felt it remains to be seen.

6.2b. "We will develop and implement the existing strategies for our cities, such as the Greater Dublin Area Transport Strategy, the Galway Transport Strategy, the draft Cork Metropolitan Area Transport Strategy, as well as strategies being developed for Waterford and Limerick, and other projects progressing through planning. Specifically, the Government will prioritise plans for the delivery of Metrolink, Luas and other light rail expansion, DART expansion and interconnector and Bus Connects in Dublin, Cork, Galway, and Limerick."

2021 Progress: In November 2020, the NTA published an Issues Paper as an initial part of a statutory review of the Greater Dublin Area Transport Strategy. The NTA asked members of the public to provide their views on the paper [as part of a preliminary consultation process](#), with feedback open from November 2020 to January 2021. Design teams were appointed to undertake the options assessment stage for thirteen corridors to be developed with bus lanes or other forms of bus priority as part of BusConnects Cork. An options report was expected Q4 2021. Plans for a €2.6 billion extension of Dart services from Dublin to Drogheda, Celbridge and Maynooth were published by the National Transport Authority in August 2020. The expansion programme, rebranded DART+, aims to double peak-hour capacity from 26,000 passengers an hour in each direction to 52,000 an hour per direction by 2028. In July 2020, the European Commission confirmed a grant award of €8.8 million for the design phase of the upgrade of the Kildare Line. This investment was secured under the EU's Connecting Europe Facility (CEF). The [second round of public consultations](#) on the DART+ West Preferred Option ran until 29th September 2021. A public consultation on the [extension of the Luas to Finglas](#) was held between July and September 2020. In addition, eight new 55 metre Luas trams were either currently in service or coming into service. Progress continued to be made on BusConnects Dublin. Since the conclusion of the third round of consultation in December 2020, the NTA reviewed and considered all submissions and are currently finalising the preliminary design of each of the Core Bus Corridor schemes. In addition, Environmental Impact Assessment Reports, inclusive of traffic impact analyses, were being prepared for each scheme. Once finished, these reports will be the basis for applications to An Bord Pleanála, together with the Compulsory Purchase Order Schedules and Maps, with specific details of lands which are proposed to be acquired. During May and June a pre-application consultation process was undertaken with An Bord Pleanála in accordance with the relevant legislation. It was the NTA’s intention to issue another update prior to submitting planning applications to An Bord Pleanála, which is [expected to occur during October / November](#), assuming Government approval of the Preliminary Business Case for the BusConnects Programme. Route H was the first of the eight main spines to open, coming into service in June 2021. The remaining phases of the network will be rolled out over an incremental basis in the coming years with the south east C spine (along the Lucan Road corridor) due to be launched in Autumn 2021.

2022 Progress: The NTA prepared an updated [Draft Transport Strategy for the Greater Dublin Area](#) based on the feedback and public consultation from 2021 and this strategy sets out the framework for investment in transport infrastructure and services over the next two decades to 2042. In addition to the 2021 progress of the Dart extension, the NTA plans enhance the level of services to

Greystones and extending the DART+ programme to deliver electrified rail services to Sallins/Naas, Kilcock and Wicklow, with consideration of potential further expansion if appropriate. As of the 28th June 2022, this Strategy is [awaiting Ministerial approval](#). Work on BusConnects Dublin is being implemented, including the new Dublin Area Bus Service Network, and will continue into 2024. Planning consent was sought out in Q1 of 2022 which would expand the LUAS light rail green lines south to Bray and the Environs area and north to serve Finglas. The LUAS red line would extend to Poolbeg, and a light rail from Lucan to the city centre to complement the bus system. In July 2022, Minister Ryan [brought the MetroLink Preliminary Business Case to Cabinet](#). Planning submission on the public transport project will be lodged this September. It is anticipated that MetroLink could be in operation in the [early 2030s](#). *"It will consist of a fully segregated railway, most of which will be underground, running from north of Swords to Charlemont in the south of Dublin City Centre. The route will include 16 stations and serve multiple residential communities such as Swords, Ballymun and Glasnevin, as well as the City Centre, Dublin Airport, and major employment, education, transport and other centres"*.

6.2.2. Public Transport

6.2.2a. "Review fare structures to ensure that public transport is as accessible as possible, supports the delivery of services, and incentivises off-peak travel."

2021 Progress: No apparent progress was made.

2022 Progress: Fares have been re-structured by introducing a 20% reduction of public transport fees and 90 minute fare for LEAP. There has been no incentivization of off-peak travel. However, the new fare structure and pricing has made a difference on usage with May 2022 public transport journeys at their [highest levels since March 2020](#) but have yet to return to pre COVID-19 levels.

6.2.2b. "Task the NTA to produce a park and ride implementation plan for each of the five cities to help reduce congestion and journey times. These will integrate car parking facilities with public transport and cycling networks and will include the provision of secure lockers for bicycles."

2021 Progress: Although the National Transport Authority has established a 'Park and Ride Development Office', there was no further progress on this commitment in 2021 apart from Minister Ryan commenting that the development of a new Park and Ride strategy should be the [next step in the process](#).

2022 Progress: [Phase 1 of the Five Cities Demand Management Study was published in 2022](#). The study was intended to inform the direction of complementary demand management policy measures at a local and national level. Phase 1 of the study consists of a report examining the qualitative elements of shortlisted demand management measures, and a set of user-friendly Toolkits to enable stakeholders, such as Local Authorities, to quickly identify appropriate demand management measures for their local contexts. [Phase 2](#) of the report quantified and predicted the impact of several demand management measures to determine what drives transport demand and how to encourage a shift towards more sustainable ways of life in Ireland's urban centres. Phase 2 highlighted measures such as improving the interchange opportunities for Park & Ride on the outskirts of cities as well as developing and implementing EV charging strategy for each city for private cars and taxis that includes Park & Ride.

6.2.2c. "Develop and implement a Sustainable Rural Mobility Plan. This will introduce a public transport service standard under which all settlements over a certain size in terms of population, combined with employment or education places, will have a service connecting them to the national public transport system. Local Link will play a key role in this development. This service standard will be informed by the Connected Ireland research being carried out by the NTA."

2021 Progress: There was no apparent progress on a Sustainable Rural Mobility Plan in 2021.

2022 Progress: In September 2021 Minister [Eamon Ryan stated](#) "the NTA is developing its Connecting Ireland Rural Mobility Plan, which has the objective of providing better connections between villages and towns through enhanced and new local routes." In April 2022, the Sustainable Rural Mobility Plan was launched as "Connecting Ireland". The Connecting Ireland Rural Mobility Plan (CIRMP), which aims to increase connectivity throughout rural Ireland, is due to be rolled out between 2022 and 2025. The Department of Transport and the NTA will accelerate a [series of network improvements](#) identified through the CIRMP public consultation. Improvements include additional stops, route modifications, and more services with the aim to increase connectivity for those based outside of bigger towns and cities. CIRMP will allow over 70% of citizens living outside the cities to have access to public transport service that provides at least three return journeys each weekday to a nearby town and improved mobility options for those in remote areas [with the provision of Demand Responsive and other transport initiatives](#). However, CIRMP is only "filling in the blanks" according to one transport expert. "There is no policy to back it up. Almost every European country lacks a comprehensive policy for rural mobility. There are no clear goals, no specific targets, no clear responsibilities and insufficient funding to meet growing needs," Brendan Finn said. Funding is not the only issue, according to conference organiser, Declan Rice, who outlined that, while €57 million was announced in October 2021 for the Local Link transport service, there was no coordination across the 15 beneficiary communities. "A fundamental lack of joined-up policy means that local authorities and communities are all doing their own thing. This policy gap cannot continue."

6.2.2d. "We will review the operations and funding of Local Link within nine months."

2021 Progress: No review of Local Link was announced .

2022 Progress: [In April 2022, Minister Ryan announced additional and enhanced local bus services to support Ukrainian refugees and stated](#), " My department and the National Transport Authority are working closely with TFI Local Link offices in rural Ireland to mobilise all available resources to strengthen our existing public transport services. We are doing this practically and quickly by adding extra stops and routes where a need has been identified. We want to ensure that passengers have access to essential services such as shopping centres, places of employment, and medical centres."

6.2.2e. "Establish a Working Group to utilise the modelling capacity of the NTA and commuter and travel data held by the CIE Group of Companies, the Central Statistics Office, NTA and other stakeholders to identify existing and potential demand for public transport and work to match demand with available services and new services, where appropriate."

2021 Progress: There were no announcements on the establishment of this working group.

2022 Progress: No announcements have been made regarding this commitment.

6.2.2f. "Ensure a national integrated public transport system with an integrated timetable, one tag on ticketing system and coordination between bus and rail timetables of all operators."

2021 Progress: The NTA continued to progress work on Next Generation Ticketing (NGT), which will implement an Account Based Ticketing (ABT) as the preferred option. This system aims to use

cashless technology, allowing for payments to be made using cEMV (contactless credit and debit cards), mobile phones and tokens, all linked to a payment account. [NGT is planned to be implemented across public transport modes including metro, Luas and rail](#). However, there was no on-the-ground implementation in 2021. In May, the NTA announced that customers will be able to use the TFI Go App on selected Bus Éireann services that operate through the Limerick City red zone. **2022 Progress:** The NTA [plans to award a contract for the NGT system by Q4 of 2023](#). Although a year behind schedule, the agency plans to roll out an account-based ticketing system that will support open-loop payments and other fare-payments methods⁵⁵. It will encompass all modes of transport in Dublin and elsewhere in the country, including buses, rail, trams and a proposed metro line. Additionally, the TFI 90 minute fare was implemented. [The TFI 90 Minute Fare](#) gives TFI Leap Card customers the option to transfer between most DART, Commuter Rail, Dublin Bus, Luas and Go-Ahead Ireland services in the Dublin area at no additional cost for 90 minutes.

6.2.2g. "Establish a National Public Transport Forum involving all stakeholders and commence Section 17 of the Dublin Transport Authority Act to establish the Dublin Transport Advisory Council."

2021 Progress: There were no announcements regarding the establishment of either the National Public Transport Forum or the Dublin Transport Advisory Council.

2022 Progress: [According to Minister Ryan](#), a National Public Transport Forum was due to be progressed in the "Sustainable Mobility Policy Framework". The [framework was published on the 7th April 2022](#), and states that "a new National Sustainable Mobility Forum" will be convened on an annual basis to review progress. There does not appear to be any more publicly available information since then.

6.2.2h. "Accelerate sustainable transport plans for schools. We will complete the review of the School Transport Scheme to seek better outcomes and reduce car journeys. The School Transport Scheme should work in liaison with the Safe Routes to Schools Programme."

2021 Progress: Minister Norma Foley [announced that the review of the School Transport Scheme had commenced](#), with the initial meeting of the Steering Group being held on 11 February 2021. However, there have been no public announcements in the intervening months.

2022 Progress: In June 2021, the steering group [presented Minister Norma Foley with an initial interim report on eligibility for the School Transport Scheme](#). Following consideration of the report, Minister Foley approved alleviation measures that allowed for the provision of transport for post-primary students who are otherwise eligible for school transport but are attending their second nearest school and had applied and paid on time. The Department has conducted an extensive stakeholder engagement process which commenced in January 2022. It is Deputy Foley's intention to advance the school transport system stating, "We have listed a variety of criteria regarding eligibility and encouraging people to access school transport, but also to pursue a green agenda in terms of accessibility. We have moved a step forward even in the short term in accessing availability for students who are not necessarily attending their nearest school but their next-nearest school. We continue apace."

6.2.3. Rail

6.2.3a. "In line with the commitment in the National Planning Framework to balanced regional development, prioritise rail projects in Cork, Galway, Limerick, and Waterford on existing and unused lines."

2021 Progress: In June 2021, funding of €184 million towards Cork Commuter rail [was announced, with new train stations planned at Blarney, Blackpool and Tivoli](#). The funding will be provided by the

European Union, as part of its NextGenerationEU recovery package for Europe. There has been little progress on rail projects in the other specified locations and the future of the Western Rail Corridor remains uncertain.

2022 Progress: Progress has been made in Cork under the Cork Metropolitan Area Transport Strategy (CMATS) - [there is to be increased frequency on the Cork to Cobh and Cork to Middleton lines](#). Additionally, the revised National Development Plan 2021-2030 includes new rail developments in Limerick. This includes “a new route to Shannon on the Limerick Colbert to Ennis line”. Along with the new Shannon route, the [Limerick-Galway line](#) will see additional stops at Parkway, Corbally, Moyross and Bunratty. The revised plan will also see a new rail line extend from Limerick Colbert to Adare, with stops in Dooradoyle, Ballycummin and Patrickswell. No progress appears to have been made in Galway or Waterford

6.2.3b. "Continue to fund safety works and capital improvements to the rail network, expand the Irish Rail fleet and progress the electrification of rail services to decrease journey times and emissions."

2021 Progress: Iarnród Éireann [announced a new National Train Control Centre](#), which will enable the integration of signalling and communications control across the entire network, with the goal of making rail traffic management more efficient. Iarnród Éireann is also continuing work on the [City Centre Resignalling Project](#). Forty one new intercity carriages are [expected to be delivered](#) by mid-2022, at a cost of €150 million (this has been delayed significantly from its originally planned provision date due to COVID-19 concern). Under the previous Government, Iarnród Éireann [commenced the tender process](#) to order up to 600 electric/battery-electric powered vehicles over a 10-year timescale. The current Government has continued this process, although there has been no announcement on the preferred supplier, which was expected to be revealed mid-2020.

2022 Progress: The first of the 41 diesel carriages ordered from the Hyundai Rotem factory in Korea are [expected to arrive in September](#) and will enter service in 2023.

6.2.3c. "Commission an economic evaluation of higher-speed rail links between our main cities."

2021 Progress: In October 2020, Minister Ryan and the Northern Ireland Minister for Infrastructure, Nicola Mallon, [announced a that feasibility study would be conducted](#) for high-speed rail. There was no announcements on when this feasibility study will be published.

2022 Progress: [The All-Island strategic rail review was published in November 2021](#) and was open for public consultation until 21 January 2022. Upon the closing date for public consultation, Minister Ryan has reaffirmed his commitment to enhancing all-island rail links.

6.2.3d. "Consider the report on the future of the Western Rail Corridor and take appropriate action."

2021 Progress: No announcements were made regarding this commitment in 2021.

2022 Progress: Dr John Bradley's "[forensic dissection](#)" of EY's report argues that the Western Rail Corridor is financially viable in contrast to EY's projections. [This is echoed by MEP Chris MacManus](#), who stated that no more reports are needed and “political will” is the only thing required for the reopening of the Western Rail Corridor.

6.2.4. Buses

6.2.4a. "Protect and expand regional connectivity and connectivity between towns and villages in rural Ireland."

2021 Progress: In December 2020, Bus Éireann announced [120 new jobs and an expansion of services](#) which included both new routes and enhanced frequency on existing routes. However,

according to one NGO representative, a further expansion was needed.

2022 Progress: 81 additional buses for regional connectivity [were announced in Budget 2022](#).

6.2.4b. "Give greater priority to bus services by expanding Quality Bus Corridors and consider the introduction of Bus Rapid Transit Services."

2021 Progress: While progress continued on the Quality Bus Corridors under BusConnects, there were no announcements on the introduction of Bus Rapid Transit Services.

2022 Progress: No progress under the expansion of Quality Bus Corridors has been seen so far in 2022. A stakeholder highlighted that the Glider system in Belfast would be a suitable option for Dublin because it is proven to be successful, feasible, and does not require additional infrastructure.

7. Buildings

7a. "We will publish our National Retrofitting Plan as part of the National Economic Plan. It will set out our commitment to:"

2021 Progress: There has been no National Retrofitting Plan published.

2022 Outcome: The National Retrofitting plan was completed as part of the [Climate Action Plan 2021](#), which was published on 4 November 2021.

7b. "1. Developing a new area-based and one-stop-shop approach to retrofitting to upgrade at least 500,000 homes to a B2 energy rating by 2030."

2021 Progress: The SEAI launched a "One Stop Shop Development Call" in 2020.

2022 Progress: The SEAI launched the one stop shop service for the long term in Spring 2022 as part of the 'New Home Energy Upgrade Scheme'. [Nine service providers operate these one stop shops](#), with plans to add more providers. However, the uptake of retrofitting has been slow and an area-based approach to retrofitting has not been rolled out.

7c. "2. Grouping homes together to lower cost, starting in the Midlands area."

2021 Progress: In September 2020, the Government approved the [allocation of €20 million](#) from carbon tax to eight local authorities under the Midlands Retrofit Project.

2022 Progress: The Midlands Retrofit Project has been piloted. However, according to a Government representative, the project did not prove to be as successful as originally thought and therefore there are no plans to replicate this elsewhere.

7d. "3. Leveraging smart finance (e.g. loan guarantee, European Investment Bank, Strategic Banking Corporation of Ireland)."

2021 Progress: EU funding provided under the European Recovery and Resilience Facility will be used to provide risk protection to banks and financial institutions that offer retrofitting loans at low rates. It is hoped that this will result in banks and financial institutions offer loans with 3.5pc interest rates to homeowners seeking to make their houses more environmentally sustainable.

2022 Progress: There was a call for banks to get involved and the EIB has approved it and will run through the strategic banking operation, aimed to be launched in November 2022. No low cost loans have been launched yet. However, there are plans to [launch these in July 2022](#). Some stakeholders felt retrofitting is still not as feasible for many lower and middle income houses, so grants should be more targeted at smaller ticket items such as roof insulation.

7e. "4. Developing easy pay-back mechanisms (i.e. through utility bills)."

2021 Progress: No obvious progress on this commitment.

2022 Outcome: Pay-back mechanisms are now available via loans.

7f. "Designate a National Retrofitting Delivery Body by the end of 2020."

2021 Progress: SEAI has been designated the National Retrofitting Delivery Body.

2022 Outcome: Completed.

7g. "In addition to the current scheme, use resources from the National Recovery Fund to immediately finance local authority retrofit programmes and to offer grants to owners of private properties. This effort will initially be focused on the Midlands, where dependence on fossil fuel is greatest."

2021 Progress: As part of the EU funding detailed in the [National Recovery and Resilience fund](#), €40 million was allocated towards "De-risking a Low Cost Residential Retrofit Loan Scheme", while €60 million was allocated towards a "Public Sector Retrofit Pathfinder Project and Public Sector Buildings' Energy Retrofit Programme".

2022 Progress: Grants to owners of private properties and local authorities are now offered. With the exception of the pilot schemes to group homes together under the Midlands Retrofit Programme, a midlands focused approach has not been adopted. According to the National Retrofitting Plan, 'In 2022, the Energy Efficiency Retrofitting Programme will see approximately 2,400 homes nationally being upgraded to a B2 or equivalent standard with a significant increase in funding support to Local Authorities to €85 million'. This is to be provided by the Minister for Housing, Local Government and Heritage for the Local Authority Energy Efficiency. The Community Energy Grant Scheme has committed €43 million for public, commercial and community buildings. €15 million of this scheme relates to home retrofits.

7h. "Commence pilot schemes in early 2021, to test key elements of the national plan, building on the work being started in the Midlands. Following evaluation of the pilots, we will roll out our National Retrofitting Scheme."

2021 Progress: In September 2020, the Government approved the allocation of €20 million from carbon tax to eight local authorities under the [Midlands Retrofit Project](#).

2022 Outcome: [The national retrofitting scheme](#) was launched in February 2022. The 10-year funding, registration, and one-stop shops are all underway, and home retrofitting is taking place.

7i. "Work with the Strategic Banking Corporation of Ireland to develop funding options to deliver retrofitting with suitable retail partners, such as An Post and the Credit Unions."

2021 Progress: Whilst there was no obvious involvement from the SBCI, both An Post and various Credit Unions have entered the retrofit finance market, with the latter receiving €10 million in additional funding from the [SEAI](#).

2022 Progress: This commitment is in progress and the [SBCI Loan Guarantee scheme](#) is expected to be launched in 2022.

7j. "Amend the Energy Efficiency Obligation Scheme to boost the supply of retrofits, by increasing the targets which obligated parties must deliver, including for domestic homes and those in energy poverty."

2021 Progress: A public consultation on the design of the new Energy Efficiency Obligation Scheme (EEOS) was launched on 4 March, with a closing date of 30 April. Submissions were being reviewed in 2021.

2022 Progress: The EEOS is amended and underway resulting in many of the one-stop-shops being funded by investments from the energy suppliers as the obligated parties. However, under the amended EEOS, ["15% of all EEOS savings... are to be delivered in the residential sector"](#). An NGO representative stated that the 15% minimum was too low, and that "a lot more" could be done through the EEOS to alleviate energy poverty.

7k. "Take steps to increase the number of homes and businesses with Building Energy Ratings (BER) and Display Energy Certificates (DEC) and use this data to increase the number of home and business retrofits being carried out."

2021 Progress: [In 2020](#), 3,964 homes were retrofitted to a 'B2' equivalent BER or higher.

2022 Progress: In 2021, 15,457 homes were retrofitted under various schemes. As of April 2022, 5,056 homes have been retrofitted, on par with last year's numbers [despite the launch of the National Retrofitting Scheme in early 2022](#). No 'deep retrofits' have been completed yet this year. Deputy Brian Stanley has described the scheme as moving at a "snail's pace". Unlike DECs, the number of people obtaining BERs is increasing all the time with an [8% increase of BER certificates](#) since 2020.

7l. "Develop standard designs available for all property types."

2021 Progress: A Standard Recommendation for the design, installation, commissioning and maintenance of heat pump systems in dwellings (titled S.R. 50-4:2021) was submitted to public consultation for a two-month period in Q3/Q4 2020. It was reviewed and published in April 2021.

2022 Outcome: Standard designs are now complete and The Heat Pump document was published.

7m. "Strengthen the capacity of state agencies responsible for the delivery of the ambitious targets we are setting out."

2021 Progress: No information on this commitment was publicly available in 2021.

2022 Progress: The capacity of state agencies has been strengthened through a substantial increase in staffing and funding. However, more capacity is still needed.

7n. "Commence a targeted programme to install heat pumps in homes that are already suitable for the technology, as part of our plan to install 600,000 heat pumps by 2030."

2021 Progress: Budget 2021 allocated funding for a new marketing and information campaign focused on promoting the uptake of heat pumps in properties deemed suitable for heat pump installation. A Digital Marketing Campaign was launched targeted at areas with clusters of heat pump ready homes and at people using specific online websites (e.g. mortgage websites, DIY) to offer an information pack on heat pumps. A series of "SEAI Heat Pump Webinar for Homeowners" were held for people who request the information pack in step 1. [The first webinar was held on 25 March 2021](#). However, according to one NGO representative, while individual actions such as those detailed above are welcome, the overall uptake of heat pump installation remains low. Construction delays due to covid restrictions contributed to this.

2022 Progress: This commitment is not on track even with increased grant funding for the installation of heat pumps in homes and according to the European Heat Pump Association, [there were only 44,000 heat pumps](#) that are operational in Ireland in 2020.

7o. "Publish a feasibility study on establishing a district heating authority and setting new targets for district heating as part of a new strategy. This will be in addition to developing a regulatory environment for district heating."

2021 Progress: No such feasibility study was produced in 2021. However, two planned district heating pilot schemes in Dublin received approximately [€25 million in government funding](#) through the Climate Action Fund.

2022 Progress: Work in the area of district heating is now in progress. The feasibility study [was published](#) as part of the SEAI 'National Heat Study' in February 2022. A new [District Heating Steering Group](#) is working on policy, planning, funding, and standards. This group is expected to [deliver a report to Government](#) in Q4 2022.

7p. "Take actions to drive energy-efficiency upgrades in rented properties and commercial building stock, following a consultation process that has already been completed."

2021 Progress: According to the [Irish Independent](#), under the Housing For All plan landlords will have to meet a minimum energy rating for their rental properties from 2025. The specific BER rating that will have to be met is yet to be decided.

2022 Progress: According to an NGO representative, this consultation is yet to be published and there is no specific plan in place for retrofitting the private sector. However, action has been taken to allow grants to be available to landlords (covering 30-50% of the cost of them) and 80% of costs for shallow measures. Some stakeholders noted a lack of communication regarding landlords and the energy actions to be taken under the 'Housing for All' plan.

7q. "Publish a new Public Sector Decarbonisation Strategy for 2030. This will include the development of policies to ensure greater use of energy performance contracts within the public service."

2021 Progress: A new Public Sector Decarbonisation Strategy is yet to be published or consulted on. DECC is currently working towards confirming a methodology for measuring, accounting, reporting and recording public GHG emission reductions. This methodology was prepared following consultation with SEAI and EPA and DECC was due to be submitted for Government approval of the methodology in Q2 [2021](#).

2022 Progress: The Public Sector Decarbonisation Strategy is awaiting a minister to be appointed as public sector owner.

7r. "Ensure that development of sustainable communities is the core objective of the LDA, delivering sustainable, climate resilient, low-carbon housing."

2021 Progress: The Land Development Agency Act was enacted on 21 July 2021.

2021 Outcome: The Act states that the one of the [functions of the Agency is](#) "to take measures to promote the sustainable development of communities and housing, including climate adaptive, low carbon and affordable housing, that are well served by schools, infrastructure that promotes and facilitates cycling or walking, public transport and public amenities".

2022 Progress: The Land Development Agency (LDA) has been established and primarily focused on city centre housing. According to a [representative of the LDA](#), with "half a million homes projected to be built nationally by 2040, the LDA is working to support the delivery of climate resilient low carbon developments." Additionally, according to an NGO representative, the LDA is taking a holistic approach to sustainability and is applying for [Home Performance Index Certification](#) across all of their sites going forward. The LDA is choosing to develop sites within existing communities, and walking distance of public transport and public amenities.

8. Energy

8a. "We will implement a new National Energy Efficiency Action Plan to reduce energy use, including behavioural and awareness aspects of energy efficiency such as building and data management."

2021 Progress: There have been no announcements made on a new National Energy Efficiency Action Plan.

2022 Outcome: The National Energy Efficiency Action Plan has been [replaced by the National Energy and Climate Plan](#). According to a Government representative, the steps of the National Energy Efficiency Plan have been integrated into NCAP21.

8b. "We will take the necessary action to deliver at least 70% renewable electricity by 2030."

2021 Progress: In [2020](#), 42.1% of Ireland's electricity was from renewables.

2022 Progress: The renewed national development plan increased the commitment of renewable energy share to 80% by 2030. According to a stakeholder from the energy sector, EirGrid's [Shaping Our Electricity Future Strategy](#) needs to be urgently updated and expanded. The representative stated that this strategy was designed for a 70 per cent target and is not capable of delivering an 80 per cent target without significant changes. Furthermore, the representative stated that renewable energy and grid projects must be prioritised and implemented through a properly funded planning system. This system must process applications quickly without sacrificing the capacity to examine them thoroughly. Other stakeholders expressed that social sustainability and energy citizenship must be incorporated into energy plans and mechanisms must be in place to heighten community involvement. According to a recent [press release from the EPA](#), coal and oil use has tripled in the energy sector while renewable energy usage has fallen 7% from 2020 levels, due primarily to weather related issues.

8c. "Hold the first Renewable Electricity Support Scheme (RESS) auction by the end of 2020, with auctions held each year thereafter, including the first RESS auction for offshore wind in 2021."

2021 Progress: The first RESS auction in 2020 was completed. However, 2021's onshore wind RESS auction was delayed and underwent public consultation in 2021. The first offshore wind RESS is due to be held towards the end of this year. [Minister Ryan has stated](#) that this auction will allow bidding on the development of about 2.5GW of offshore wind in the Irish Sea.

2022 Progress: Two successful RESS auctions have been held in addition to several corporate power purchase agreements. There are approximately 11 terawatt hours of renewable energy being generated between RESS one and RESS two. A corporate power purchase is about 6 terawatt hours more that are contracted through planning, which will bring Ireland up to 55-60% renewable electricity by 2025. The commitment appears to be on track. However, the 2021 offshore RESS auction (O-RESS1) has not yet been held. The 2023 timetable was released recently with ambitious targets but some stakeholders felt it needs to be even more ambitious and needs actions on the ground. According to one stakeholder, prices for onshore renewables in RESS 1 and RESS 2 are far higher than achieved in other European markets. While still cheaper than fossil fuels, the stakeholder felt that if the prices could be lowered further greater benefits from the energy transition could be delivered to consumers.

8d. "Produce a whole-of-government plan setting out how we will deliver at least 70% renewable electricity by 2030 and how we will develop the necessary skills base, supply chains, legislation, and infrastructure to enable it. This new plan will make recommendations for how the deployment of renewable electricity can be sped up, for example the provision and permissioning of grid connections."

2021 Progress: There have been no announcements made regarding an overarching renewable electricity plan.

2022 Outcome: The Climate Action Plan 2021 is considered the whole-of-government plan to achieve this commitment.

8e. "Complete the Celtic Interconnector to connect Ireland's electricity grid to France."

2021 Progress: In July 2021, EirGrid submitted a planning application to An Bord Pleanála for the Irish onshore element of the Celtic Interconnector under the Strategic Infrastructure Development process. The public consultation regarding the Celtic Interconnector planning application closed in September 2021. A full timeline detailing the progress of the Celtic Interconnector can be found [here](#).

2022 Progress: This commitment is progressing as planned. [Planning permission](#) to complete the Celtic Interconnector was granted and will have contracts signed by the end of this year.

8f. "Commence planning for future interconnection with our neighbours."

2021 Progress: The only other planned interconnector is the Greenlink, a 500MW between Ireland and the United Kingdom. However, work began on this during the previous Government and no additional proposed interconnectors have been announced since the current coalition entered into power.

2022 Progress: Planning for future interconnections with neighbours has commenced. Greenlink has reached financial close and gone into construction, which is aimed to be done by the end of 2023/2024. Preparatory on-shore construction work has begun on the GreenLink project, in both Wales and Ireland and work has begun to examine what phase 3 offshore wind looks like. This is expected to include further interconnection. The North-South interconnector was [fully approved in Q4 2021, and Eirgrid is ready to begin construction](#).

8g. "Finalise and publish the Wind Energy Guidelines, having regard to the public consultation that has just taken place."

2021 Progress: Despite it being over a year since the conclusion of the public consultation, no Wind Energy Guidelines were published in 2021.

2022 Progress: No progress appears to have been made on this commitment. The current wind energy guidelines are 16 years old. A new set of draft guidelines were to be signed off on by the previous Government. [According to Deputy Crowe](#), these appear to have been "buried" following the "election, Covid and a host of other issues" Despite it being two years since the public consultations, no wind energy guidelines have been published. However, according to a stakeholder from the energy sector, this is something the Government is actively working on.

8h. "Develop a Solar Energy Strategy for rooftop and ground based photovoltaics, to ensure that a greater share of our electricity needs is met through solar power."

2021 Progress: In 2021, the Government did not consult on or produce an overall Solar Energy Strategy.

2022 Progress: A Government source indicated this commitment has been completed and is present in the 2021 Climate Action Plan. Microgeneration grants, microgeneration clean export premiums, and clean export guarantee with RESS will include small-scale generation, and launch consultations will be the last chunk of the solar strategy by Q3 2022. A new Renewable Energy Directive, an Energy Efficiency Directive, and Energy Performance of Buildings are currently being negotiated. Therefore, the Government may be awaiting EU legislation before an overarching Solar Energy Strategy is published.

8i. "Continue Eirgrid's programme 'Delivering a Secure, Sustainable Electricity System' (DS3)."

2021 Progress: The DS3 programme has been continued.

2022 Progress: The DS3 is continuing with additional batteries connected to the grid this year.

8j. "Ensure that the energy efficiency potential of smart metres starts to be deployed in 2021 and that all mechanical electricity metres are replaced by 2024."

2021 Progress: In June 2021, over [360,000 smart metres](#) had been installed to date. The ESB is continuing the rollout of smart metres, stating their intention to install an additional 500,000 by the end of 2021 and a similar number each year until 2024, when it is hoped [2.4 million will have been installed](#).

2022 Progress: Smart metres installation is on track. Over 750,000 smart metres have been installed

to date, with this figure expected to rise to 1.1 million by the end of the year. The National Smart Metering Programme, overseen by the CRU, [*“will roll out and install 2.3 million metres by 2025”*](#).

8k. *“Invest in research and development in ‘green’ hydrogen (generated using excess renewable energy) as a fuel for power generation, manufacturing, energy storage and transport.”*

2021 Progress: There have been no major public announcements made on Government investment in green hydrogen research and development.

2022 Progress: The [*‘Consultation on developing a hydrogen strategy for Ireland’*](#) was opened on the 12th July 2022. The [*Green Hydrogen Strategy Bill 2022*](#), introduced on 9th February 2022, is currently before the second stage of the Dáil. *“This Bill entitled an Act to require the Minister for the Environment, Climate and Communications to draft and publish a hydrogen strategy within six months of the passing of this Act.”*

8l. *“Produce a longer-term plan setting out how, as a country, we will take advantage of the massive potential of offshore energy on the Atlantic Coast. This plan will set out how Ireland can become a major contributor to a pan-European renewable energy generation and transmission system, taking advantage of a potential of at least 30GW of offshore floating wind power in our deeper waters in the Atlantic.”*

2021 Progress: There were no announcements made regarding a long-term, offshore energy plan in 2021. However, in May 2021, the Department of the Environment, Climate and Communications published a framework for Ireland’s future offshore electricity transmission system. This framework provides for a phased transition from a decentralised offshore transmission system model to a centralised model over the course of the decade, with ownership of offshore transmission system assets to be assigned to EirGrid. The full policy statement can be found [here](#).

2022 Progress: NCAP21 sets a target of 5GW of offshore renewable energy (ORE) by 2030. According to a Government representative, most of the resources in ORE development are dedicated to achieving the current 5GW target. However, there have been significant discussions and time dedicated to discussing how the 30GW target will be achieved. In December 2021, the Government published a [*Policy Statement “on the facilitation of Offshore Renewable Energy by Commercial Ports in Ireland”*](#). This statement details how ports will provide facilities and infrastructure to support offshore renewable energy. Additionally, [*“A number of ports and private entities are already progressing plans”*](#) to do this. The SSE [*stated in June 2022*](#) that the 5GW of ORE generation by 2030 target should be increased to 7GW *“and then subsequent targets of 10GW by 2035, 15GW by 2040, 22GW by 2045, and 30GW by 2050.”*

8m. *“Increase the target for the number of Sustainable Energy Communities.”*

2021 Progress: The Government’s latest [*Interim Climate Actions progress report*](#) (published May 2021), listed the 2030 target for Sustainable Energy Communities as 1,500. This was identical to the number specified in 2019’s Climate Action plan.

2022 Outcome: According to the SEAI, there are [*“over 600”*](#) sustainable energy communities in Ireland. [*As of January 2022*](#), the target still appears to be 1,500.

8n. *“Prioritise the development of microgeneration, letting people sell excess power back to the grid by June 2021.”*

2021 Progress: [*A public consultation on a Micro-generation Support Scheme*](#) was held from January to February. No final document has yet been produced, meaning that as of 2021 no policy framework existed for selling excess power back to the grid. While progress towards a Micro-generation Support Scheme is a positive development, according to an NGO representative, the

proposed scheme contained various barriers to microgeneration, including the setting of restrictive conditions on excess power payments.

2022 Outcome: This scheme is now in place under the Clean Export Guarantee Tariff for both domestic and non-domestic projects. The tariff amount is set by each provider at an expected [“fair market rate”](#). Non-domestic projects generating more than 6kW but less than 50kW are eligible to receive a tariff at a rate of 13c/kW exported under the Clean Export Premium (CEP) tariff. However, SEAI grants for new microgeneration projects (both domestic and non-domestic) and the CEP tariff will be gradually phased out from 2024 onwards, a move criticised by the Micro Renewable Energy Federation (See [Commitment 1.2e](#)).

8o. “Ensure that community energy can play a role in reaching at least 70% renewable electricity, including a community benefit fund and a community category within the auction.”

2021 Progress: The Government published a draft guidebook of Good Practice Principles with the goal of ensuring successful operation and delivery of Community Benefit Funds under the RESS. [A public consultation on this guidebook](#) was open from 30 March to 24 May. In December 2020, the SEAI and DECC [launched a €28 million](#) Community Energy Grant Scheme for community energy projects across Ireland.

2022 Progress: All RESS Projects must establish a Community Benefit Fund, and a RESS Community Steering Group was established to engage with the Communities Sector to understand community concerns, bringing together a [“wealth of experience and knowledge from across the community and academic sectors”](#). The enabling framework is up and running for the 2030 national target of 500MW. Seventeen projects have been contracted through RESS, both grid and planning is up and running. According to a representative in the energy sector, guidance for community benefit funds for offshore projects will go out to consultation soon.

8p. “Support a new Green Flag programme for communities, building on the successful programme in schools.”

2021 Progress: There were no public announcements made on a Green Flag programme for communities.

2022 Progress: No progress appears to have been made on this commitment.

8q. “Conclude the review of the current planning exemptions relating to solar panels, to ensure that households, schools, and communities can be strong champions of climate action.”

2021 Progress: There were various updates on timelines and internal Department discussions, but no tangible progress. According to NGO representatives, urgent work is needed on this commitment. The planning requirement for school solar panels was recognised as an oversight by the previous government, and, over the last number of years, rectifying action has been pledged multiple times. The extra cost burden associated with the planning process means that schools are estimated to pay an additional €6,000 to €8,000 to install solar panels. In addition to this financial cost, the planning situation is also significantly lengthening the timescale of solar installation in schools.

2022 Progress: As of June 2022, the Government reported [work is ongoing](#). However, stakeholders highlighted extreme delays as a particular failure. Planning interim regulations have faced delays, most recently following the requirement for an Strategic Environmental Assessment. A Government representative indicated this assessment will commence shortly, following a public consultation which opened on the 15th June and is set to conclude on the 13th July 2022. In responding to a Parliamentary Question on Tuesday 26th July 2022, [Minister Burke stated](#) that *“the proposed exempted development regulations must be laid in draft form before the Houses of the Oireachtas*

and receive a positive resolution from both Houses before they can be made” and that this process is expected to be “completed in the coming months”.

8r. "Develop new stress tests for financial institutions to look at the impact of tangible risks of higher temperature scenarios and involvement with the fossil-fuel economy on their portfolios, as recommended by the Taskforce on Climate Financial Disclosures."

2021 Progress: There were no announcements regarding the development of such stress tests in 2021.

2022 Progress: Financial Stress Tests are currently being conducted by the [European Central Bank](#). The 2022 tests are the first to incorporate a climate criteria. The deadline for bank resubmissions to address outstanding Quality Assurance issues is the end of June. Relevant EU legislation is also being drafted in this area. Results are due to be published by mid-July. However, this will be in the form of aggregate results, not bank by bank. Irish banks participating in this scheme include [Bank of Ireland](#) and [AIB](#).

8s. "Develop a regulatory environment to support the development of district heating."

2021 Progress: A public consultation on a [“Policy Framework for the Development of District Heating in Ireland”](#) was held between December 2019 and February 2020. However, the current Government had not made any announcements regarding the final framework in 2021.

2022 Progress: As of May 2022, the Government reported [work is ongoing](#). A District Heating Steering Group was established, which will report annually to the Government regarding the development of district heating. A Government representative indicated the Steering Group will report to the Government later this year and will present recommendations for targets for the rollout of district heating. In November 2020, DECC published ‘Geothermal Energy in Ireland - A Roadmap for a Policy and Regulatory Framework’, outlining how geothermal energy could be harnessed for district heating projects. Climate Action Plan 2021 reaffirmed the Government’s commitment to expanding district heating. A potential KPI of up to 2.7 TWh of district heating by 2030 is suggested in this plan, in addition to a commitment to update the regulatory framework. District heating projects are currently underway in Tallaght and Dublin City.

8t. "Develop efficiency standards for equipment and processes, particularly those set to grow rapidly, such as Data Centres."

2021 Progress: There were no public announcements suggesting that efficiency standards will be applied to data centres. According to representatives from NGOs, efficiency standards will not offset the energy demand of data centres. In their view, the growth in data centres is resulting in major demands on electricity, which is putting pressure on the security of supply. They are concerned that this insecurity, in turn, could lead to the lock-in of gas infrastructure, significantly threatening Ireland’s transition to renewable energy. The Business Post reported that, during a meeting with Amazon, the Taoiseach’s speaking notes stated that the government will try to ease the progress of [data centre development plans](#).

2022 Progress: In NCAP21, the Department of Enterprise, Trade and Employment committed to progressing a review of the data centre strategy which is due to be completed Q2 2022. The revised EU Energy Efficiency Directive, currently being negotiated, will inform efficiency standards for data centres. The development of new data centres is projected to put serious pressure on the electricity system - up to 30% of the demand for electricity in Ireland by 2030. This represents a major impediment to Ireland’s climate goals. Additionally, the drive for the development of more data centres has been highlighted as [“one of the most glaring inconsistencies”](#) and a [“contradiction”](#) in Irish climate policy. Despite the Government’s ambitious climate targets, it has been argued that the

approach to data centre expansion has not changed sufficiently. In May 2022, EirGrid announced that they have cancelled the development of 30 data centre projects. This followed a de facto moratorium on new data centre projects announced in November by the Commission for the Regulation of Utilities. In line with the commitment in NCAP21, [the Department of Enterprise, Trade and Employment](#) have begun engaging with stakeholders and the review of the data centre strategy is due to be completed Q2 2022.

8u. "Develop expectations for 'Obligated Entities' to leverage carbon credits."

2021 Progress: The Government consulted on the Energy Efficiency Obligation Scheme between March and April this year. One of the listed topics for review was ["Who will be obligated to achieve energy savings under the scheme, and how they will be obligated"](#). Submissions were being reviewed in 2021.

2022 Progress: The Energy Efficiency Obligation Scheme has been finalised. Expectations have been developed for obligated parties under the energy efficiency obligation scheme. There will be carbon farming as a part of agriculture but this will not be completed until 2024.

8v. "Develop a policy framework for low emission zones."

2021 Progress: No announcements were made regarding low emission zones in 2021.

2022 Progress: The interim policy is done, and low emission zones will be incorporated into the Clean Air Strategy.

8w. "End the issue of new licences for the exploration and extraction of gas, on the same basis as the recent decision in relation to oil exploration and extraction."

2021 Progress: As early as February 2021, the Department of the Environment, Climate and Communications was no longer accepting new applications for exploration licences. The issuing of new licences for the exploration and extraction of oil and gas was formally banned by legislation amending the Petroleum and Other Minerals Development Act 1960. This legislation was included in July's Climate Action and Low Carbon Amendment Act 2021.

2022 Progress: The Government introduced a ban on new oil and gas exploration licences (amending the 1960 Petroleum Act) in conjunction with the 2021 Climate (Amendment) Act. A new policy statement in relation to existing licences in light of this legislative change is due this year.

8x. "Ensure that Bord na Móna is required to take into account climate, biodiversity, and water objectives, as they deliver on their commercial mandate, through an amendment to the Turf Development Acts 1998."

2021 Progress: No bill proposing an amendment to the Turf Development Act 1998 has yet been made public.

2022 Progress: There has been no amendment to the Turf Development Act.

8y. "We shall withdraw the Shannon LNG terminal from the EU Projects of Common Interest list in 2021."

2021 Progress: The Government has stated it no longer backs Shannon LNG and is not seeking to have it included when the next PCI list is drawn up. However, the current PCI list is valid until September, and [the terminal has not been officially withdrawn from this list](#).

2022 Progress: Shannon LNG is not on the sixth PCI list. A stakeholder commented that even though Shannon LNG is no longer on the list, there is a risk that Shannon LNG will retain certain benefits under EU law as a result of being on the previous list.

8z. "We do not support the importation of fracked gas and shall develop a policy statement to establish that approach."

2021 Progress: In May 2021, the Government published a [Policy Statement](#) on the Importation of Fracked Gas. This document states that, pending the outcome of a DECC review of the energy security of Ireland's electricity and natural gas systems, Government support for the importation of fracked gas will be withdrawn.

2022 Progress: Shannon LNG was still in a position to apply for strategic planning and subsequently was able to apply for a new planning application. The decision is expected in December 2022. The Government introduced a policy statement which brought a moratorium on the importation of fracked gas and LNG, pending an ongoing energy security review. Despite this statement, Shannon LNG was still in a position to reapply.

9. Agriculture and Forestry

9a. "Carry out a baseline biodiversity survey on every farm to inform future policy development."

2021 Progress: No announcement regarding a farm biodiversity survey was announced in 2021.

2022 Progress: Applications to participate in 'Farm Environmental Surveys' (FES) were [closed on the 27th May 2022](#), with the aim to "set a baseline biodiversity database for agricultural land". However, given the early stages of the project, only 0.5% of farms have undergone inspections.

9b. "Publish a new National Pollinator plan and encourage public bodies to promote and protect biodiversity."

2021-2022 Progress: See [Commitment 2f](#).

9c. "Complete a national hedgerow survey."

2021 Progress: No announcements were made in 2021 regarding this commitment.

2022 Progress: No progress or announcements have been made regarding this commitment.

9d. "Incentivise the rewetting of carbon-rich soils."

2021 Progress: Contracts for peatland rewetting were [awarded and signed](#) with two European Innovation Partnerships applicant groups in March 2021. Wetland Surveys Ireland Ltd. will look at developing a proposed farm programme that will aim to enhance the ecological and hydrological functioning of transitional areas. This is proposed to be done through a hybrid results-based payment model whereby farmers receive results-based payments based on the quality of their habitats, while also having the opportunity of claiming additional funds to undertake farm actions. Green Restoration Ireland will work with participating landowners who farm peatlands. They will provide support through participatory learning and advice to voluntarily transition their land use from current conventional farming practices to economically viable carbon farming methods. Lessons learned and data gathered will be used to establish a practical model for future expansion of these new methods on farmed peatlands. A separate results-based initiative, FarmPeat, was officially launched by Minister Hackett in July 2021.

2022 Progress: EU funded and co-funded LIFE projects are progressing work on peatland rewetting. Several new NPWS projects are examining incentivisation of peatland rewetting through farming schemes and also incentivising Bord Na Mona through just transition funding to re-wet bogs. However, one stakeholder expressed concern that the farm based schemes are too small and farmers are reluctant to commit to blocking drains as the scheme only lasts for three years. Outside of bogs and peatlands, there is not much progress on rewetting other soil types and carbon rich soils are still being drained for afforestation and farming. The focus of this commitment has mainly been on peatlands rather than non-peat carbon rich soils.

9e. "Invest in research in the agri-food sector, prioritising investment in areas such as climate and the bioeconomy."

2021 Progress: Budget 2021 [provided an extra €4m in funding to Teagasc](#), as well as an increased allocation of €3m for the DAFM's competitive research funding programmes.

2022 Progress: In principle, there has been progress on this commitment via increased funding, but the focus is not related to climate or bioeconomy, so there are concerns regarding how the funding is being used. The 25% emissions reduction target for the agricultural sector was announced in July 2022 though it is unclear as yet how this will impact future research in the agri-food sector.

9f. "We will implement the National Policy Statement on the Bioeconomy, providing the agri-food sector with new opportunities, using biological resources from the land and sea in a sustainable and circular manner."

2021 Progress: The first meeting of the National Bioeconomy Forum [took place in July](#). Other than this, there were no announcements made on the bioeconomy in 2021.

2022 Progress: Some progress has been made on this commitment and there is good representation of stakeholder groups within the forum. The new forum has met but the National Policy Statement has not yet been implemented.

9g. "Explore and develop potential opportunities for farmers from anaerobic digestion."

2021 Progress: No obvious progress in 2021.

2022 Progress: [In July 2022, the Government announced](#) additional resources and commitments to scale up and speed up progress on anaerobic digestion have been agreed as part of the sectoral emissions ceilings negotiations, including up to up to 5.7 TWh of biomethane as part of a new "Anaerobic Digestion for Nature" programme. However, no further detail was provided.

9h. "Develop climate action 'signpost farms' to provide on farm experience of the benefits of farming sustainably."

2021 Progress: Teagasc's Signpost Programme was launched in May 2021, with 100 farms participating.

2022 Progress: The Signpost Programme has received significant attention from the media and the project is progressing well according to an NGO representative. However, with only one year of data from the farms now available, it is still uncertain how effective this work will be in reducing agricultural emissions.

9i. "Establish an 'Energy Efficient Farming' scheme, to include a farm efficiency rating, educational support and grant subsidies for onsite renewable energy options and the promotion of energy efficient technology for farm use."

2021 Progress: No such scheme was announced in 2021.

2022 Progress: No noticeable progress has been made.

9j. "Expand programmes such as the Agricultural Sustainability Support and Advisory Programme (ASSAP), working with farmers, industry, and advisory services to deliver real improvements in water quality."

2021 Progress: No obvious progress was made in 2021.

2022 Progress: There have been discussions about expanding programmes such as the ASSAP, but expansion is questionable due to uncertainty about its effectiveness. See [Commitment 3.1.2d](#) & [Commitment 9.2.7k](#).

9k. "Implement the climate adaptation plan for the agri-food and seafood sector and assist these sectors to adapt with the changed environment."

2021 Progress: There was no information available regarding the extent to which the plan has been implemented in 2021. There does not seem to have been any major policies addressing climate adaptation publicised by the current Government, with the National Adaptation Framework and all current Sectoral Adaptation plans carrying over from the previous government.

2022 Progress: As above.

9l. "Review pesticide use across the agricultural sector, while acknowledging the comparatively low level of pesticide use in Ireland; and provide supports to farmers who are undertaking these practices to reduce their dependence on such chemicals."

2021 Progress: During [Minister's Questions in May 2021](#), Minister McConalogue stated "a number of measures are in place to review pesticide use across the agriculture sector. These include collection and analysis of pesticides sales data on an annual basis, a rolling programme of pesticide usage surveys, covering all main crops, and calculation of Harmonised Risk Indicators for assessing trends in risk from pesticide use." One stakeholder described this statement as nothing new and the way pesticides have always been reviewed.

2022 Progress: No obvious progress is available regarding how pesticide use is being re-examined. [A recent article](#) in The Times (UK) reported that Irish food is one of the most pesticide contaminated in Europe. Stakeholders felt no significant action has been taken to address pesticide use.

9.1. Flagship Environmental Scheme

9.1a. "We will design a flagship environmental scheme under the new CAP that is user friendly for farmers, delivering broader environmental and biodiversity benefits and aligning financial support with climate, forestry, and land use objectives."

2021 Progress: The public consultation on the proposed interventions outlined in Ireland's CAP Strategic Plan (CSP) 2023-2027 was [opened on the 30th of July and closed on the 27th of August 2021](#). A key element of this strategic plan will be a new flagship Agri-Environment and Climate Measure (AECM), which will be the main programme under Pillar II of CAP.

2022 Progress: The 1.5 billion euro "Agri-Climate Rural Environment Scheme" (ACRES) [was announced on 21st of June 2022](#) and has been ["cited by the Government as a new REPS"](#). The scheme is composed of a focused Co-operation Projects scheme targeted towards specific geographical areas which will garner €700 million of funds and a general scheme open to all farmers. An NGO spokesperson said that the Co-operation Projects scheme would support targeted biodiversity action, but the general ACRES scheme was lacking the bespoke ecological advice necessary to support farmers, which raised doubts about its efficacy. [Tim Farrell of the ICSFA](#) has stated that this programme appears to make little improvement over the GLAS and expressed dissatisfaction over the small number of regions included in the scheme. The ICSFA have argued that this scheme brings less benefits for farmers to "who want to go the extra mile" compared to the previous REPS. An NGO representative expressed scepticism at the efficacy of this plan due to the loose inspection measures employed in previous results-based schemes.

9.1b. "This will be complemented by an ambitious ECO-scheme under Pillar 1 of the CAP, rewarding farmers who deliver enhanced environmental performance." AND

9.1c. "We will pilot this agri-environment scheme during the CAP transition period, supported by additional exchequer funding. The scheme will seek to include farmers not currently in GLAS, who previously participated in AEOS, and those exiting GLAS. This pilot will inform the shape of the flagship agri-environment scheme for the next CAP."

2021 Progress: There was some progress towards a new results-based programme for Irish farmers

to replace the Green Low-carbon Agri-environment Scheme (GLAS) with the Results Based Environment Agri Pilot Programme (REAP). The scheme was oversubscribed, indicating that farmers are keen to do their part. A separate results-based initiative, [FarmPeat](#), was launched for farmers with peat soils, with €1.2 million in funding provided.

2022 Progress: The REAP scheme has continued, with [3,740 farmers participating as of the 6th of July 2022](#).

9.2. National agri-food policy

9.2a. "Publish a successor strategy to Foodwise 2025, within six months of government formation, providing an ambitious blueprint for the industry for the years ahead, adding value sustainably in the agri-food sector into the future, and supporting family farms and employment in rural Ireland." AND

9.2b. "Ensure that, in addition to growing international markets and value-added export as a key priority, a strategic focus of the Foodwise 2025 successor strategy will be on environmental protection, reversing biodiversity decline and developing additional market opportunities for primary producers, closer to home."

2021 Progress: In August 2021, the Government approved [Food Vision 2030](#). The Environmental Pillar had one seat on the Agri-Food 2030 Strategy Committee. The Pillar's representative was chosen by the Department, the Pillar itself was not allowed to choose their own representative. The Pillar reluctantly withdrew from this committee, having concluded that the draft strategy was ["woefully inadequate to meet the social and environmental challenges we face"](#). Dr Elaine McGoff of An Taisce stated at the time that ["This was ultimately an undemocratic process, with the agri-food industry pulling the strings"](#).

2021 Outcome: According to representatives from various environmental NGOs, Food Vision 2030 is evidently not compatible with meeting climate and biodiversity targets. They felt that it envisages yet more growth in output, with strong scientifically-evidenced concerns being almost entirely disregarded in the final document. One NGO representative stated that the Government has "absolutely, categorically failed" on this commitment, commenting that Food Vision 2030 is a document that engages in greenwashing to a large degree. They stated the current Agri-Food Strategy perpetuates the agricultural model which is directly responsible for escalating nitrogen and phosphorus pollution and damaging the environment.

9.2c. "Build upon schemes such as Areas of Natural Constraint, the Beef Data and Genomics Programme, Beef Environmental Efficiency Programme (Suckler), the Knowledge Transfer Scheme and the Sheep Welfare Scheme, in a way that enhances farm incomes, while contributing to climate change, biodiversity and animal welfare objectives, and recognising their significant contribution to net farm incomes."

2021 Progress: While there were expansions in funding for a number of these schemes, to what degree they contribute positively to climate change and biodiversity objectives is unknown as there has been no major overhaul of any of the programmes.

2022 Progress: Funding has continued for these programmes. However, NGO representatives have expressed concerns over their environmental impact, arguing these programmes may increase overall emissions. They stated that agricultural emissions have increased because such a focus on animal efficiency allows Ireland to say it has a more efficient system to justify continued expansion of the animal-based agricultural sector.

9.2d. "The Government will undertake a national land use review, including farmland, forests, and peatlands, so that optimal land use options inform all relevant government decisions. The review will balance environmental, social, and economic considerations and involve a process of evaluation of the ecological characteristics of the land."

2021 Progress: Although Minister Ryan referred to this goal on a number of occasions in 2021, there was no progress published regarding a plan itself, perhaps due to the need for greenhouse gas accounting practices to be finalised in the new climate legislation first.

2022 Progress: The National Land Use Review is currently in progress with Prof. Alan Matthews chairing the review committee. The EPA issued a 'Call for Evidence' to assist this process which closed on the 4th February 2022. Stakeholders expressed concerns that the review may have a narrow scope, focusing mainly on climate, but that it should also include a broader focus on biodiversity and water quality.

9.2.1. Dairy

9.2.1a. "Invest strategically in the future development of the dairy sector, focusing on greater efficiency and sustainability."

2021 Progress: No obvious progress on this commitment occurred in 2021.

2022 Progress: Investments in the dairy sector are happening. However, these investments are not delivering on environmental objectives.

9.2.1b. "Encourage investment in renewable infrastructure on farms to reduce energy costs."

2021 Progress: No obvious progress on this commitment occurred in 2021.

2022 Progress: Some progress has been made in the area of renewable infrastructure on farms, including a [Bill on microgeneration combined with rooftop solar](#) (announced 15 June 2022). According to a stakeholder, this Bill would allow farmers to avoid planning permission for such systems in most scenarios.

9.2.2. Tillage

9.2.2a. "Work to increase the adoption at farm level of Teagasc recommendations for climate-smart cultivation methods."

2021 Progress: No increase in adoption was publicised through Teagasc's new environmental flagship project, Signpost. However, the project does include the tillage sector among others.

2022 Progress: This commitment is in progress through Teagasc's Signpost project but with only one year of data thus far, the project is still in early stages with research outcomes as yet unpublished.

9.2.3. Horticulture

9.2.3a. "Review the supports available to the horticultural sector and encourage greater expansion and growth in this sector, supplying both the domestic and international market."

2021 Progress: The Scheme of Investment Aid for the Development of the Commercial Horticulture Sector was [introduced in 2020](#), with applications for funding being submitted during September 2020. The upper cumulative limit per applicant for investments under the scheme over the period 2020-2027 is [€5 million](#).

2022 Progress: Additional funding was made available in 2022 for the horticulture section. The additional funding is going towards equipment for the mechanisation of the industry as opposed to

increasing sustainability practices. Moreover, there is no specific ring-fencing fund for more sustainable measures for alternatives, and the funding is provided just to maintain the industry. Additionally, a stakeholder highlighted that the horticulture sector in Ireland is retracting with some of the largest vegetable producers in Ireland shutting down from lack of support.

9.2.4. Organic Farming

9.2.4a. "We will set an ambitious new target for organic farming, to meet changing consumer trends in this area." AND

9.2.4b. "We will commit to aligning Ireland's organic land area with that of the current EU average over the lifetime of this Government."

2021 Progress: Food Vision 2030 sets a target of at least 7.5% of utilisable agricultural area to be farmed organically by 2030. The Organic Farming Scheme [re-opened for applications](#) from 1 March to 30 April 2021, with an additional budget of €4 million.

2022 Progress: This commitment is improving incrementally. A stakeholder pointed out that Ireland is committed to aligning organic land area and increase in funding but this is all happening at a very low baseline, so the targets will not be achievable with the current level of funding.

9.2.5. Animal Welfare

9.2.5a. "Extend the badger vaccination programme nationwide and end badger culling as soon as possible, consistent with the best scientific and veterinary advice."

2021 Progress: According to the Irish Wildlife Trust, badger vaccination was rolled out in 2021, albeit slowly, and, while the numbers of badgers being killed was coming down, it remains around 5,000 per annum. Padraic Fogarty, who represents the IWT on the TB Forum, does not see any indication that pressure is coming from the Government to accelerate this to the point where [culling will end any time soon](#).

2022 Progress: One stakeholder expressed frustration that the commitment's goal to end culling "as soon as possible" meant there is no specific timeline to this commitment. No announcements have been made regarding this commitment.

9.2.6 Young Farmers

9.2.6a. "Ensure an increased emphasis, through our agricultural colleges, on education in the areas of sustainability, agroecology, climate action and biodiversity, and the link to land use, soil health and agriculture."

2021 Progress: No announcements were made regarding this commitment in 2021.

2022 Progress: No announcements have been made regarding this commitment.

9.2.7. Soil Health and Nutrient Management

9.2.7a. "Deliver an incremental and ambitious reduction in the use of inorganic nitrogen fertiliser through to 2030."

2021 Progress: Food Vision 2030 restated this ambition, promising a drop in emissions associated with chemical fertiliser by more than 50% by 2030. However, there was no reported drop in fertiliser use since the Government entered power.

2022 Progress: There has been a marginal decrease in the use of inorganic nitrogen fertiliser but not at the levels required within the farm to fork strategy, this commitment is overall not ambitious enough when looking at the EU strategy.

9.2.7b. "Publish a National Soils Strategy that will assess all appropriate soil health parameters and will inform future policies on good soil-management practices."

2021 Progress: According to the Irish Wildlife Trust, a new soil survey was launched in 2021.

However, there has not yet been any consultation announced on the development on a National Soils Strategy. Approximately €2 million has also been provided by DAFM to purchase monitoring equipment for a [National Agricultural Soil Carbon Observatory](#) to measure greenhouse gas fluxes from soils under agricultural management.

2022 Progress: While there has been little focus on soil health in the National Soils Strategy, thus far this commitment is in progress as the soil survey has been circulated and Minister McConalogue [launched a €10 million investment](#) for a soil sampling and analysis pilot programme that aims at prioritising soil health, soil carbon, and fertility.

9.2.7c. "Review the effects of the nitrates derogation on water quality, in conjunction with the EPA, which will inform future policy in this area."

2021 Progress: Although this review is mentioned again in Food Vision 2030, there was no evidence of the review itself having been commenced in 2021.

2022 Progress: There is no evidence of any review. The nitrates action plan recently came out and according to a stakeholder, there has not been any noticeable change from the last plan except for some increase in climate and water ambitions.

9.2.7d. "Work with nitrates derogation farmers to improve environmental outcomes on their farms, ensuring the sustainable use of the derogation, in line with our environmental objectives."

2021 Progress: The Terms and Conditions of the Nitrates Derogation were updated for 2021. Details of the environmental requirements of the 2021 Nitrates Derogation can be found [here](#). See also below commitments on a national liming programme and on the development of nutrient management plans.

2022 Progress: No significant shift in environmental requirements from the Nitrates Derogation. This was stated from a stakeholder to be an overall environmentally damaging scheme and the requirements are not strong enough.

9.2.7e. "Encourage farming practices, which preserve or enhance soil organic matter."

2021 Progress: There was a lack of publicly available information on this commitment.

2022 Progress: Various stakeholders commented that this commitment is fairly vague and there has been very little advice surrounding farming practices and soil health.

9.2.7f. "Introduce a national liming programme to improve nitrogen-use efficiency."

2021 Progress: [As of August 2021](#), all nitrate derogation farmers must now adopt a farm scale liming programme based on a current Nutrient Management Plan and associated soil analysis results.

2021 Outcome: The liming programme can be up to 4 years in duration with a minimum of 25% of lime spread in year 1, or this may be front loaded into years 1 and 2. Lime applied since the soil samples were taken and prior to 2020 can be included in meeting the requirements for the liming programme. The balance of lime must be spread over a maximum of 4 years.

2022 Progress: Aside from the encouragement of farmers to adopt farm scale liming, there has been limited progress.

9.2.7g. "Encourage the use of protected nitrogen (urea) on grassland and greater take up of low emissions slurry spreading."

2021 Progress: No obvious progress on this commitment in 2021.

2022 Progress: Increased use of protected urea and low emissions slurry spreading is mandatory for

Nitrates Derogation farmers. In the new nitrates action programme, limits have been introduced for farmers over a certain intensity to use low emissions slurry spreading. Awareness raising efforts via Teagasc advisory services and the Signpost project is leading to increased uptake on use of these technologies.

9.2.7h. "Improve nutrient management planning and investigate and support dry manure systems for housed livestock."

2021 Progress: No obvious progress in 2021.

2022 Progress: There are no indications that nutrient management planning is being used.

9.2.7i. "Encourage better grassland management and support the use of clover and other mixed species in grass reseeding and the protection of older swards."

2021 Progress: No obvious progress in 2021 beyond the launch of Teagasc's Signpost project.

2022 Progress: According to an investigative journalist, more farmers are switching over to the use of clover and other mixed species in grass reseeding.

9.2.7j. "Invest in research and innovation in areas such as feed additives, protected nitrogen, and other climate-action areas of advancement."

2021 Progress: No obvious progress in 2021.

2022 Progress: There is an encouragement of feed additives but unaware of how the research and innovation is being measured for this commitment. Additionally, there has been an uptake in use of protected nitrogen, but no noticeable progress or outcomes from other climate action areas of advancement.

9.2.7k. "Focus on improving knowledge transfer in the area of nutrient management and soil health."

2021 Progress: Teagasc advisory services have been working with farmers to develop nutrient management plans for farms, having completed almost 5,000 plans for farmers within Nitrates Derogations between January and March 2021. In addition, a Nutrient Use Efficiency training course has been developed for farmers with a focus on the efficient use of Nitrogen and Phosphorus in grassland systems. Training of advisors on the course content and delivery tools has been completed. To date advisors have [trained approximately 2,500 farmers](#) by Zoom and training courses will continue until the end of 2021.

2022 Progress: According to an NGO representative, [Agricultural Sustainability Support and Advisory Programme \(ASSAP\)](#) works with the farmers about nutrient management and water quality but farmers are being left on their own when it comes to soil health, there is encouragement behind this commitment but unaware of how this is being measured.

9.2.7l. "Publish a roadmap with specific targets and actions on each of these measures within the first 100 days of Government."

2021 Progress: 'Ag Climatise', the National Climate and Air Roadmap for the Agriculture Sector, was [published on 9 December 2020](#). In the same month, the Environmental Pillar [warned that the roadmap](#) "perpetuates business-as-usual practices that will continue to wreak havoc on our environment and prevent us from meeting our climate targets."

2022 Progress: Similar to 2021 progress, the roadmap was debunked by a civil society organisation and a stakeholder commented that Ireland is "nowhere near the rolling average of 7% reduction in emissions or the EU strategies."

9.3. Forestry

9.3a. "Publish a successor forestry programme to deliver an ambitious afforestation plan reviewing grant and premium rates across all categories in this area, with a particular focus on an increased farmer rate of support."

2021 Progress: Minister Pippa Hackett established Project Woodland in 2021, bringing various parties together to work towards the fulfilment of this commitment. The outcome of Project Woodland is unclear and Ireland continues to [fall well short of afforestation targets](#). There have been no major changes to the cycle of monoculture planting and clear-felling for those operations that can get through the licensing system. According to the Irish Wildlife Trust, a successor forestry programme is probably a year off and it remains unclear how radical a change a new regime will bring. Nevertheless, the IWT senses that a largely transformed forestry sector is on the cards.

2022 Progress: According to an NGO representative, licences are being processed slowly and Project Woodland has achieved some outcomes, such as a regulatory review and significant levels of stakeholder consultations. A new Forest Strategy is expected in Autumn 2022 and a new Forestry Programme early in 2023. Some stakeholders expressed grave concern with bottlenecks in Ireland's forestry programme and their critical role in addressing our climate targets. According to an NGO representative, Minister Hackett's vision of the "right tree in the right place under the right management" does not seem to be filtering through. Poor forestry licences are still being issued to plant trees on high nature value farmland and important sites for ground nesting birds. There were serious concerns that the significant pressure and threat that is afforestation in appropriate places is not being taken seriously by the Government.

9.3b. "Implement the MacKinnon Report and review the forestry appeals process, to ensure that it is aligned with other comparable appeals processes and that the licensing system is sufficiently resourced to clear the existing backlog, with the prompt issuing of licences in the future."

2021 Outcome: According to [media reports from July 2021](#), 1,836 forestry licences had been issued since the start of the year, with 40% of the target of 4,500 forestry licences to be issued in 2021 reached on July 9, according to figures from the Department of Agriculture, Food and the Marine. These licences cover 2,695ha of potential new forestry, an increase of 21% on the area licensed to the same date in 2020, and a 5% increase in the number of afforestation licences issued.

2022 Progress: According to an investigative journalist, parts of the Mackinnon report are being implemented. However, these parts are more detrimental to the environment because of limiting access to the appeals process. It is now harder for members of the public to take an appeal because of increased fees for gathering documentation and bringing your appeals which is limiting environmental groups from engaging.

9.3c. "Support the development of on-farm forestry initiatives through the new CAP, aligning agrienvironment schemes with climate-change objectives and investing further in knowledge transfer." AND

9.3d. "Incorporate afforestation into the new CAP to provide incentives for farmers to plant woodland on their farms, acting as a carbon store, helping to promote wildlife corridors, and providing a future fuel source for the household." AND

9.3e. "Actively promote and support farm forestry/rewilding options that do not impact on agricultural production and support biodiversity and habitat creation. We will incentivise the option of small-scale (e.g. one hectare) forestry/rewilding."

2021 Progress: As these three commitments fall under the area of CAP, the provision of information is not possible until the final CAP Strategic Plan is published.

2022 Progress: Under the new CAP, there is mention of farmers planting their land for agri-environmental measures. According to an NGO representative, this tends to be done to land which is least productive and the least agriculturally productive land on farms is typically wetlands, which is consequentially the most ecologically productive land on the farm. It will be proposed that farmers should be exempt from requirements and licensing.

9.3f. "Embark on an ambitious programme of afforestation on state-owned lands, building on the Coillte/Bord na Móna initiatives."

2021 Progress: : In August 2020, the creation of the Woodlands Creation on Public Lands scheme was [announced](#). Under this scheme, funding is provided to public bodies for native woodland planting on a per hectare basis.

2022 Progress: According to an investigative journalist, this commitment is not achieving as expected as there is little to no uptake so far of the woodlands creation on public lands.

9.3g. "Task Climate Action Regional Offices to work with public bodies to review land available for planting providing feedback on the potential in this area, by the end of 2020."

2021 Progress: While there were [media reports in November 2020](#) detailing how Cork County Council's Climate Action Regional Offices were contacting all public sector landowners in the county to develop a database of areas suitable for planting native woodland trees, the Government did not publish a wider status update on this commitment in 2021.

2022 Progress: In May 2021, applications for 88ha of planting had been received under this scheme, which was considered miniscule by some stakeholders.

9.3h. "Institute a state-sponsored national Tree Planting Day and provide communities across the country with trees to plant on this day annually."

2021 Progress: October 1 2020 was the first National Tree Day. 1,500 native tree saplings were made available through the campaign website for primary schools to plant on their school grounds, or in a pot in the classroom.

2022 Progress: A public awareness campaign was undertaken and there is now an [annual National Tree Planting Week](#) in Ireland.

9.3i. "Engage with local authorities and local communities in a radical expansion of urban tree planting and neighbourhood and community forests."

2021 Progress: There has been no obvious "radical expansion" in this area.

2022 Progress: Does not see much progress in expansion.

9.3j. "Promote close to nature-continuous cover forestry systems to ultimately create permanent biodiverse forests containing trees of all ages." AND

9.3k. "Encourage the private sector to meet corporate social responsibility or sustainability objectives by investing in native woodlands, building on the Woodland Environmental Fund." AND

9.3l. "Promote planting of 'protection forests' along rivers and lakes to protect water quality and assist in managing flood risks."

2021 Progress: Awaiting publication of a successor forestry programme for information on these commitments.

2022 Progress: According to an NGO representative, continuous cover forestry is not being promoted. Additionally, there has been some uptake but no noticeable progress with the Woodland Environmental Fund and little to no promotion of planting protection forests.

9.3m. "Provide increased support for the development of agroforestry/silvopasture on Irish farmlands."

2021 Progress: There has been no major expansion of supports for agroforestry/silvopasture.

2022 Progress: There has been no major expansion of supports for agroforestry/silvopasture.

9.3n. "Continue to uphold the objectives of the Forest Consent System, the Bird and Habitats Directive, the catchment management approach of the Water Framework Directive and the Forest Law and Enforcement Governance Trade regulation (FLEGT)."

2021 Progress: There was a lack of publicly available information in 2021 on the extent to which these various schemes are being upheld.

2022 Progress: There have been significant problems with licensing systems and how environmental assessments are being carried out. According to an investigative journalist, there are issues with how the EIA process came out in the appeals process with licences paused and sent back to the department for not completing the EIA appropriately.

9.3o. "Invest in schemes that promote recreational forestry and work with Coillte on projects such as Coillte Nature to provide the public with access to recreational forests across the country."

2021 Progress: Recreational forestry applications can apply under a number of existing schemes and Coillte Nature continued its work in this area.

2022 Progress: Several stakeholders commented that Coillte Nature is doing good work with a new model and many changes have already been implemented. However, their projects are relatively small and few in number and more needs to be implemented for native woodland to come back.

9.3p. "Expand the NeighbourWood Scheme, providing communities with amenity woodlands for local access, enjoyment and increasing tourism opportunities."

2021 Progress: There was no major expansion of this scheme announced in 2021.

2022 Progress: No noticeable movement or expansion of this scheme in 2022. Expansion would have to be within the new forestry and payments model, but little funding is going towards the NeighbourWood Scheme.

9.3q. "Ensure that Coillte's remit supports the delivery of climate change commitments and the protection of biodiversity. We are fully committed to the retention of the commercial forests of Coillte in public ownership."

2021 Progress: There was no indication that this was being addressed in 2021. Coillte Nature is being expanded to include legacy plantations in the west of Ireland, but, [according to the Irish Wildlife Trust](#), if the potential scale of this is to be achieved the Government needs to step in.

2022 Progress: Views on the progress of this commitment were divided among stakeholders. However, all agreed that it was a very important commitment though ill defined. There has been no review of Coillte's remit. In an answer to a recent Parliamentary Question to the relevant minister, one stakeholder felt Minister McConalogue thought Coillte was operating well as is. In contrast, another stakeholder felt that Coillte tends to be financially driven and continues to ignore biodiversity and climate change. Yet others agreed there has been decent progress with Coillte Nature and they have [implemented a lot of significant changes](#) regarding their climate remit. Coillte launched a public consultation on a new strategy earlier this year.

9.4. EU Common Agricultural Policy

9.4a. "Seek reforms to the CAP to reward farmers for sequestering carbon, restoring biodiversity, improving water and air quality, producing clean energy, and developing schemes that support results-based outcomes." AND

9.4b. "Continue to support farmers to embrace farming practices that are beneficial environmentally, that have a lower carbon footprint, and that better utilise and protect natural resources." AND

9.4c. "Advocate for a fair system of eligibility conditionality, under the reform of Good Agricultural and Environmental Condition rules, recognising that farmers should not be unfairly penalised for maintaining land that contributes to biodiversity principles."

2021 Progress: The CAP negotiations concluded in June 2021. The public statements made by Minister for Agriculture, Charlie McConalogue, in the run up to the final deal perhaps give an indication of the progress towards this commitment. According to the Irish Wildlife Trust, Minister McConalogue failed to acknowledge the climate and biodiversity crisis, instead repeatedly using the phrase "maximum flexibility". [The IWT suggested](#) that this can be read as "keeping as much of the money for doing as little" as possible and flags this as a concern in the as Ireland moves towards developing its own CAP plan. One NGO representative claimed that the Irish Government undermined the setting of ambitious environmental objectives during the CAP negotiations.

2022 Progress: According to an investigative journalist, Ireland pushed for as much flexibility to bring it to the lower end of the scale of the percentage of farms that has to be left to nature or have biodiversity related projects on it. Ireland wanted the lowest percentage allowed and called for the maximum flexibility as laid out in the CAP strategic plan with the European Commission scolding the inadequacy of Ireland's CAP plan.

10. Other Commitments

10.1 Public Procurement

10.1a. "Seek to minimise the environmental impact and optimise the community benefit of products and services procured." AND

10.1b. "Support innovation in supply markets to increase the availability and effectiveness of sustainable solutions." AND

10.1c. "Encourage suppliers to adopt practices that minimise their environmental impact and deliver community benefit." AND

10.1d. "We will task the Office of Government Procurement to update all procurement frameworks, in line with green procurement practice over the next three years."

2021 Progress: In 2021, the EPA was updating the guidance for public officials on GPP which was expected to be available in Q2 2021. The new Waste Action Plan for a Circular Economy also contains a series of measures aimed at expanding and strengthening [the usage of GPP in Ireland](#).

2022 Progress: Similar progress to last year. The EPA published a [new guidance](#) on green procurement in Q3 of 2021 designed to assist procurers to build green criteria into public tenders. In May 2022, Senator Higgins' '[Quality in Public Procurement](#)' Bill passed the Committee Stage in the Seanad, "the Bill will make price-quality ratio the default approach for awarding public contracts, either on its own or combined with life-cycle costing."

10.2 National Development Plan

10.2a. "We will bring forward the planned review of the National Development Plan (NDP) from 2022. We will use the review to set out an updated NDP for the period to 2031." AND

10.2b. "The review of the NDP will be consistent with the ambition of the Programme for Government. The updated NDP will be aligned with the National Planning Framework (NPF)."

2021 Progress: The planned review of the National Development Plan was brought forward, with a [public consultation](#) taking place between November 2020 and February 2021. The new NDP was due to be published in September 2021. **In 2021**, it was still too early to tell whether the review of the NDP will be "consistent with the ambition of the Programme for Government".

2022 Progress: [The revised NDP 2021-2030](#) was published in October 2021 and aims to support economic, social, environmental, and cultural development across all parts of the country under Project Ireland 2040 in parallel with the NPF. The [revised NDP is stated](#) to be ambitious, substantial, and signals a clear response to the climate crisis.

10.3. Tourism

10.3a. "Develop a Sustainable Tourism Policy document, and in advance of this an Interim Action Plan."

2021 Progress: During Minister's Questions in on 28 April 2021, [Minister Martin stated that](#) "the development of a new national tourism policy, with sustainability at its core, will commence later this year when the sector begins to recover from the COVID-19 crisis".

2022 Progress: [A working group was established](#) under the Tourism Action Plan 2019-2021 to review international policy and best practice in sustainable tourism and propose guiding principles for sustainable tourism development in Ireland. An interim action plan was published which identifies a suite of actions that aim to promote sustainable tourism practices out to 2023.

10.4 A Shared Island

10.4a. "Explore how bodies established under the Good Friday Agreement can ensure that there is a joined-up approach to environmental issues on an all-island basis and seek to develop an all-island strategy to tackle climate breakdown and the biodiversity crisis."

2021 Progress: These bodies met once, with no significant environmental outcomes. One NGO representative commented that the extent to which this commitment can be met with lack of enthusiasm from the Northern Irish government is questionable.

2022 Progress: [A report from the National Economic and Social Council \(NESC\)](#) was published in April 2022, highlighting the support for an all-island approach to economic, social, environmental, and well-being challenges facing the island of Ireland. These recommendations include: increase in all-island infrastructure investment; increased coordination on climate and biodiversity actions; closer and more strategic cooperation between further and higher education and training institutions; and enhanced cross-border cooperation in local and sustainable tourism.

10.4b. "Promote an all-island approach to land-use planning and river-basin management plans to stop cross-border pollution."

2021 Progress: No obvious progress in 2021.

2022 Progress: [A 2022-2027 River Basin Management Plan](#) for Ireland was published in September 2021 and is currently going through the review process of the public consultation. According to the [draft River Basin Management Plan](#), "The National Technical Implementation Group (NTIG) oversees technical implementation of the RBMP at a national level and provides a forum to ensure coordinated actions among all relevant Agencies and other State actors. It also addresses any operational barriers to implementation that may arise. The Northern Ireland Environment Agency

(NIEA) attends the group's meetings to provide updates on progress within Northern Ireland and also contributes to any discussions on cross border catchment issues."

10.5 Rural Development

10.5a. "Publish and implement a new Rural Policy to build on the progress of the Action Plan for Rural Development to promote rural recovery and development in the wake of the COVID-19 crisis."

2021 Progress: A new rural development policy, "[Our Rural Future](#)", was published in March 2021. It provides a plan for developing rural Ireland over the next five years, including its' transition to a climate neutral economy.

2022 Progress: No obvious progress in 2022.

10.6 Local Government

10.6a. "Build the capacity of local authorities to lead locally and engage citizens on climate change and biodiversity."

2021 Progress: In 2021, [27 of the 31 Development plans](#) were being reviewed and adopted in the context of Local Authority Climate Action Plans.

2022 Progress: [According to Councillor Nicholas Crossan](#), "All local authorities have co-signed the Climate Action Charter for Local Authorities and they have been formally adopted in each individual council. The Charter commits Local Authorities to several actions that will ensure that they play a key leadership role locally and nationally in delivering effective climate action."