



**Submission by Good Energies Alliance Ireland
to the
Call for Expert Evidence - Climate Action Plan 2023
From Government of Ireland**

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Background

Good Energies Alliance Ireland (GEAI) is an environmental NGO, founded in 2011, situated in County Leitrim in Northwest of Ireland, who aims to ensure the wellbeing of people and communities on the island of Ireland and elsewhere through the protection and sustainable development of our environment, natural resources and our communities.

Our main objectives are:

- To carry out the activity of promotion of environmental and climate protection and monitoring of energy production and use on the island of Ireland and its territorial waters and elsewhere and any other related activities.
- To establish, promote and operate programmes and services with a view to fostering the economic, personal, cultural, recreational, and social well-being of the communities of Ballinaglera and wider areas and develop Ballinaglera Community Hall as an environmental and community resource centre.

Some of the submissions in which GEAI already participated are the Design of a new Renewable Electricity Support Scheme (RESS) launched in September 2017; the Public Consultation on the National Adaptation Framework on climate change on December 2017 to the Department of Communications, Climate Action and Environment; among others.

Just Transition

Q1. What types of supporting interventions should be considered by the Government to address the four principles of our Just Transition Framework within individual sectors?

Focus: On Stop Shop.

GEAI recommends expanding the “On Stop Shop” programme to promote personal service advice about energy poverty, to increase budget for social associations to make it easier. If the Government support social associations more people would be able to receive help since national authorities have enough expertise to deal with vulnerability contexts.

Q3. What additional targeted supports should be considered to minimize the impact of our climate policies to those on low income or households that are most at risk from fuel poverty (including transport and heating)?

Focus: housing indicators.

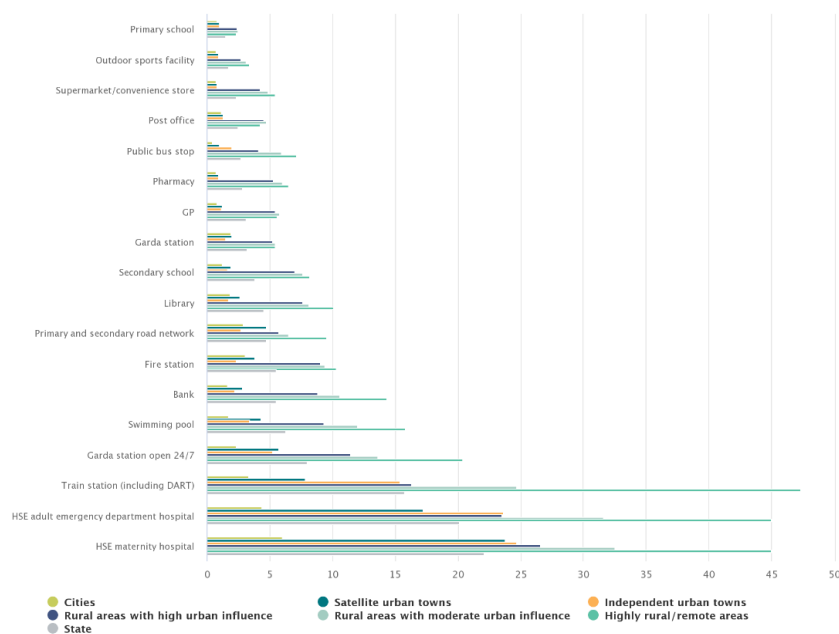
The Government should take housing location indicators to analyse current fuel poverty situations and, to prioritise houses in rural and disadvantaged areas in financial support.

Q4. Are there any emerging areas of vulnerability in specific sectors of the economy as a direct result of the implementation of Ireland's climate action policies?

Focus: rural areas.

Generally speaking, larger urban areas are more politically efficient. Additionally, as we can see in the next chart for CSOs, people living in urban areas have more resources and services.

Figure 5.11 Average distance (km) of residential dwellings to selected services in 2019, by area type



Source: CSO Ireland

For this reason, we believe that people in rural areas need special attention when implementing a just transition strategy, since governments do not always consider focusing particularity on rural areas due to geographic distance or insufficient population. Also, considering that special and protected areas are located often in these rural settings, a just transition strategy should count also with an ecosystem preservation dimension.

Q5. How should Local Authorities seek to integrate just transition considerations into the preparation of their statutory Climate Action Plans?

Focus: climate dialogues, exchange actions, stakeholders.

Social associations, NGO's and other social or political agents are crucial to understand the current situation. Because these agents can manage to help vulnerable people. They have expertise on helping people and to analyse their situation. It is important that Local Governments can meet them on regular basis. Social actors as well as Local Governments would have more knowledge and will have more strategic vision with these multilateral meetings.

Another key aspect is that Local Authorities have sufficient information about social realities. Climate Dialogues can help them by legitimating programmes, as well as, with other innovative proposals. But it is not enough, a scientific background must be incorporated to achieve more complex objectives.

The European Union has many initiatives for tackling Climate Change, and to create Just Transition policies among others. GEAI recommends Local Authorities to look into these initiatives. Such example is [Convent of Mayors](#), where mayors from around Europe share good practises. Another example is the [Just transition platform](#), where European Union help Member States and Regions with Just Transition.

Q6. What other issues should be considered by the Government to inform just transition policy in the 2023 Climate Action Plan?

Focus: living costs.

Life costs are increasing day by day, as it is extensively known. The Government should help people with living costs, including the just transition panoramic. Ireland counts with projects for renewables, energy communities and is working through a Circular Economy, more progress and seriousness on these matters could pose a window of opportunity for the Government to really progress a just transition.

Q7. Should the proposed Just Transition Commission have any other functions in addition to those described above?

Focus: social networks.

As it has been mentioned above, it is important that authorities (or in this case) the Just Transition Commission to agree on meetings with social associations, NGOs, Public

Participation Networks, relevant companies, trades unions, etc. Multilateral meetings can help on joining forces, exchange knowledge and roadmaps to achieve all that has been proposed.

Q8. What mixtures of skills and expertise are required on the Just Transition Commission?

Focus: stakeholders.

The Just Transition Commission must liaise with other commissions and ensure that the just transition vision is incorporated into their policies. In addition, they should be analytical to add different perspectives from other agents such as: social associations, NGOs, Public Participation Networks, relevant companies, trades unions, etc.

Transport

Q1. What obstacles exist in the planning system that may prevent greater modal shift from being achieved? Are there specific measures that can be implemented to avoid further forced car dependency or lock-in of unsustainable practices?

Focus: Population distribution, social stigma, forced car ownership, fossil fuel dependency, public health.

In Ireland, the transport sector is the 3rd biggest contributor accounting for 17% of the countries' total emissions. The vast majority of the emissions of the sector are produced by road transport. Within this percentage, 54% is attributed to the use of passenger cars and 30% to buses and heavy goods vehicles¹.

Developing an efficient public transport network should be one of the top priorities to attain the goals set by the Government to tackle climate change. However, data shows that even in densely populated areas such as Dublin, where the public transport network is wider, around 60% of the population uses a private car².

Sustainability has more than just an environmental dimension, but also economic and social. GEAI identified 5 concerns, transversal to every dimension, that show the impact that the public transport network has. They are as follows:

- Migration of the population

One of the main factors that affects the decision of acquiring a house is accessibility. In the 2016 Census, data showed a trend where the population had shifted to bigger cities such as Dublin, Cork and Galway and rural areas surrounding these. Furthermore, the distribution of the population also dictates in which regions projects to improve the transport network focus.

¹ Agency, E. (2022). Transport. [Link](#).

² How We Travelled -CSO -Central Statistics Office. (2022). [Link](#).

Counties such as Leitrim, where only 20 people live per square kilometre, present a greater challenge for the improvement or creation of new routes.

- Social stigma

In the Irish psyche, the use of public transport is associated with poverty, i.e., owning a car implies a higher status. This viewpoint must be challenged. One way to tackle this stigma is through campaigns that promote public transport as a clean and efficient mean of transport, and on how it reflects care for the environment and community.

- Transport poverty and forced car ownership

GEAI's concern lays not only on the lack of connections between towns but also insufficient routes and schedules provided. In some cases, buses only operate a few times per week, making it impossible for someone to use public transport to commute to work daily.

When the public transport network available is not adequate, households are forced to purchase a private vehicle. As previously explained, passenger cars are responsible for most road transport greenhouse gas emissions. Maintaining a family car costs an average of over 10 000 € year, including car maintenance and fuel. Forced Car Ownership no doubt causes a strain on Irish families' financial situation. If a family does not have the financial means to buy a car, they also do not have equal access to job, educational and social opportunities.

- Dependency on fossil fuels

One of the actions proposed by the Department of Transport is the increase of biofuels in diesel blends to 20% (B20) and ethanol in petrol blends to 10% (E10)³. It is true that using a blend of fossil fuel and bio/renewable fuel reduces emissions. It has been shown that using B20 blend reduces carbon monoxide, particulate matter, and HCs emissions, respectively in 11%, 10% and 21%. However, GEAI believes this measure only promotes a gradual change when we need to make a drastic one. A biofuel is any fuel obtained from biomass, plant, algae, or animal based. One of the issues associated to this type of fuel is land use. To create crops to produce them the rainforest is destroyed, ecosystems are threatened, and arable land is not being used to prevent world hunger and ensure food security.

- Public health

The use of fossil fuels has an obvious impact on physical health. In 2016 in Europe, around 400 000 premature deaths could be attributed to fine particulate matter (PM2.5) and over 70 000 to NO₂ emissions. Particulate matter (PM) can be categorised according to their source, exhaust, or non-exhaust. Fossil fuelled vehicles present both types, while an EV only non-

³ Minister Eamon Ryan announces the publication of the Renewable Fuels for Transport Policy Statement. (2022). [Link](#).

exhaust PM. Exhaust PM consist mostly of PM2.5 and are proven to contribute to respiratory diseases and increased cancer incidence⁴.

Q2. What changes should be considered in relation to the management of Ireland's road network (e.g. reducing speed limits, parking policy, road user/congestion charging) to reduce congestion and support the prioritisation of more sustainable modes?

Focus: upgrade current infrastructures, employers, flexible work schedules.

The biggest contributors to traffic congestion are private vehicles. The first measure to reduce it is the shift to public transport. However, more alternatives should be developed. Roads should be improved to include safe bicycling lanes. Another interesting option is supporting companies that are the biggest employers. Measures could include grants to support the creation of their own routes dedicated to employees or flexible work schedules that would allow people to avoid peak traffic hours.

Following the example of other European countries, zero carbon urban areas should be created, where only EV or hydrogen fuelled public transport is allowed.

Q3. What policies or measures can be considered to further incentivise the use of more sustainable modes of transport for education and leisure-related journeys?

Focus: cultural events.

There is no doubt of the richness and variety of cultural events available in Ireland. An allowance or reduced prices could be permitted for attending such events using sustainable modes of transport.

Q4. How can EV and other transport grants/supports be more targeted (spatially, demographically) to deliver additional emissions reduction or address distributional impacts in a more equitable manner?

Focus: electrification, rural electrification.

The emissions are far less per passenger in a bus than in a private car, if the average passenger number is greater than seven. Emissions of a diesel bus 801 g CO₂ per km, emissions of a car 121.5 g CO₂ per km. Considering the setting of the rural public transport network, where a bus is rarely at full capacity, it is quite clear the necessity to move to electric vehicles as quickly as possible and reasonable. Support should be given to the companies that keep the rural network afloat, to transition to more sustainable vehicles.

⁴ Khomenko, S., Cirach, M., Pereira-Barboza, E., Mueller, N., Barrera-Gómez, J., Rojas-Rueda, D., de Hoogh, K., Hoek, G., & Nieuwenhuijsen, M. (2021). Premature mortality due to air pollution in European cities: a health impact assessment. *The Lancet Planetary Health*, 5(3), e121–e134. [https://doi.org/10.1016/s2542-5196\(20\)30272-2](https://doi.org/10.1016/s2542-5196(20)30272-2)

GEAI suggests that whenever a fossil fuelled vehicle is decommissioned, it should be replaced with a vehicle with zero direct carbon dioxide emissions. Furthermore, when new buses are acquired, choose EV or hydrogen and construct infrastructures to allow charging and fuelling of these vehicles. However, a moratorium should be proposed to push the use of private and company vehicles as long as possible.

Q5. What expectation or level of public transport service is appropriate in rural communities and what other key measures can support a transition to sustainable modes?

Focus: rural mobility.

According to Connecting Ireland's Rural Mobility Plan, 2 in 5 villages are not connected to the nearest big town⁵. When developing new routes, efforts must be made in the sense to not only connect towns but also allow enough flexibility to include each community's needs. The best way to understand a group of individuals is to include them in the process. No doubt, the new network will still present dark spots and, for this reason, it is also required the creation of an app or, for instance, other channels for people to safely share rides. The app should use an algorithm to connect people using similar routes. If to be applied to a smaller community, a meeting could be mediated by an expert in planning. The expert would be provided by Local Authorities and would mediate and create an appropriate network of shared rides.

Q6. What other opportunities exist to support the decarbonisation of the Transport sector?

Focus: dynamic routes, innovation.

Dynamic routes with creation of virtual bus stops. A virtual stop is a designated pick-up and drop-off location without any physical infrastructures. This requires an app that will tell the closest stop where you can get a bus according to the needs of the passengers in real time. Because there are no physical infrastructures, you can have more stops. At the Dublin Tech Summit panel "Building future cities: does sustainable transport hold key?" Chris Snyder, the European CEO of Via, said virtual stops would significantly reduce the time in which new stops can be implemented. With the proper algorithm, dynamic routes could also be more efficient. This could translate into a more attractive public transport network, hence incentivising everyone to use it and shift away from private fossil fuel vehicles.

Waste and Circular Economy

Q1. What are the main barriers to consumers embracing the Circular Economy, e.g. lack of awareness, increased costs compared to disposable products, lack of access to circular goods and services?

⁵ National Transport. (2022). [Link](#).

Focus: multidimensional barriers.

There are several barriers to the advancement of the Circular Economy (CE). They are as follow:

Cultural barriers:

- High environmental awareness of suppliers and customers
- Not all counties have access to CE products or initiatives.
- Lack of knowledge, substitutes. What CE includes and the products that belong to it.
- Lack of visibility and promotions of citizen initiatives.
- Lack of economic capital to purchase such products or services.

Technical barriers:

- Lack of technical skills.
- Lack of strategies and infrastructure to foment symbiosis between industries, sectors or fields on waste processing, ideas, partnerships, creativity hubs...
- It is not included in the academic curriculum, or it does so in a residual way, in engineering or vital careers for the EC.

Political and economic barriers:

- Use of designs that do not aim at saving resources and energy efficiency, like the eco-design does.
- Sustainable waste management.
- The cost of new innovations and "green" business models.
- Frameworks and regulations, not clear enough or insufficient in this area.

Q2. What other opportunities exist to support decarbonisation through the acceleration of a transition to the circular economy?

Focus: access, training and awareness, funding.

Some ideas:

- a) Encourage the valorisation of products and services that come from the Circular Economy. This could be achieved through the creation of standards or seals that the Government itself can grant, if said product and service meets specific characteristics.
- b) Create standards and indicators that allow analysing the number of products and services belonging to the Circular Economy that are consumed. So that annual analyses can be carried out and weak points can be found to be reinforced.
- c) Channelling information and funding, to citizen initiatives to have a greater impact at the local level and access to needs and demands.

- d) Giving visibility to the social impacts of the Circular Economy.
- e) Linking with other national and regional initiatives/platforms, to exchange good practices and lessons.
- f) Promoting industrial symbiosis, where waste wastes or by-products of an industry or industrial process become the raw materials for another⁶.
- g) Training of the workforce in sustainable design, logistic, business strategies, regulations and policy... adapting this training to the targeted sector.
- h) Stimulate financial institutions to join, define targets and innovate in their financial mechanisms towards this type of economy.
- i) Digitalisation of industry. The European Industrial Strategy sets the objective for European industry to be competitive, climate neutral and digitised. This could be achieved by creating mechanisms, funding or schemes to promote the digitalisation of the industry.
- j) Promote and reward closed business models, where resources are continuously recycled into new products without being exhausted or wasted. Accompany them in the process of including elements of the Circular Economy in their business model.

Final conclusion

Fighting climate change must be a priority and a multi-sectoral approach is vital. Changes and actions must be implemented in all those areas that aim to generate a greater impact, but without forgetting the inclusion of communities in it. Sustainable benefit must permeate all layers of society.

⁶ European Commission – Industrial Symbiosis. [Link](#).