

# PUBLIC CONSULTATION FINDINGS REPORT

Public Consultation Held on 8 February – 7 March 2024 on the Draft  
Review of Ireland's National Energy and Climate Plan (NECP) 2021-2030

IE000716C  
May 2024

## PUBLIC CONSULTATION FINDINGS REPORT

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*Individual respondents' names and/or personal identifiable information is not included in this report and organisations, where confidentiality is not requested, are named.*

### **Important Note**

*The information and views included in the feedback presented in this Report represents the view of stakeholders who made submissions during consultation and engagement. Information is reported as it was provided by stakeholders in their public consultation responses, some of which is subject to verification by the project team.*

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# 1 EXECUTIVE SUMMARY

National Energy and Climate Plans (NECPs) are the framework within which European Union Member States must plan their climate and energy objectives, targets, policies, and measures to the European Commission. The National Energy and Climate Plans (NECPs) are the main strategic policy planning tool for Member States to describe how they will meet the objectives and targets set in the Energy Union and stay on track to achieve climate neutrality and resilience by 2050. They provide short, medium and long-term investment predictability, and are a key tool to mobilise the massive investment needed to achieve the collective goal of climate neutrality. The plans help to ensure that the EU's transition is socially just, provides energy security and affordability.

The European Green Deal, the fast-evolving geopolitical context and the energy crisis have led the EU and its Member States to accelerate the energy transition, and to set more ambitious energy and climate objectives, with a strong focus on the diversification of energy supplies. These developments are reflected in the legislative framework adopted under the 'Fit for 55' package and the REPowerEU Plan.

Member States are required to develop NECPs on a ten-year rolling basis, with an update halfway through that covers the five Dimensions of the Energy Union. The process for updating Ireland's NECP 2021-2030 commenced in 2023, with a draft updated plan submitted to the European Commission in December. It outlines our energy and climate policies in detail for the period from 2021 to 2030 and looks onwards to 2050. This draft plan is the subject of the consultation findings contained in this report.

The draft plan will be further revised to incorporate comments from the Commission and this public consultation, and to reflect updated policies and targets, with a final version due to be submitted in June 2024.

Public consultation on the draft updated NECP ran from 8 February to 7 March 2024. The process began in December when the Department of Energy and Climate Change (DECC) compiled a list of 500 stakeholders – comprising public sector, industry, transport, education, youth, food / agriculture, energy, community, NGO, and others – to whom emails were sent advising them of the consultation process and encouraging them to participate.

During the month-long consultation period, submissions were received from 37 organisations / individuals, either directly by email or through an online feedback form. Respondents included the agriculture, energy, environmental, NGO, renewable energy, trade and transport sectors, as well as individuals.

A wide-ranging selection of responses was received, with 10 key themes emerging, which are summarised in Section 3 of this report. Among the topics that recurred most, or on which the most detailed submissions were received, were energy, the approach taken to developing the NECP, the quality and timing of consultation, the need for a "just transition" approach to the plan and its implementation, and climate change.

While the need for ambitious measures to reach carbon emissions reduction targets was acknowledged, it was stressed that the final plan must also take cognisance of numerous other factors, and must therefore (among other things):

- Be practical and realistic in its proposals;
- Align with the CAP 2024 and ensure an integrated approach to delivery of both;
- Ensure that targets are clear and specific and are across short-, medium- and long-term timeframes;
- Consider the potential for environmental impacts, including unintended ones, from the measures set out;
- Ensure fairness to all sectors of society in its approach and, in particular, adequately address the issue of energy poverty;
- Address inadequacies in the planning system;
- Include all available technologies and forms of energy in its scope; and
- Consider areas in which further research could be usefully included in its scope.

Suggestions and recommendations were put forward in responses on how some of these matters could be meaningfully or better addressed in the final plan.

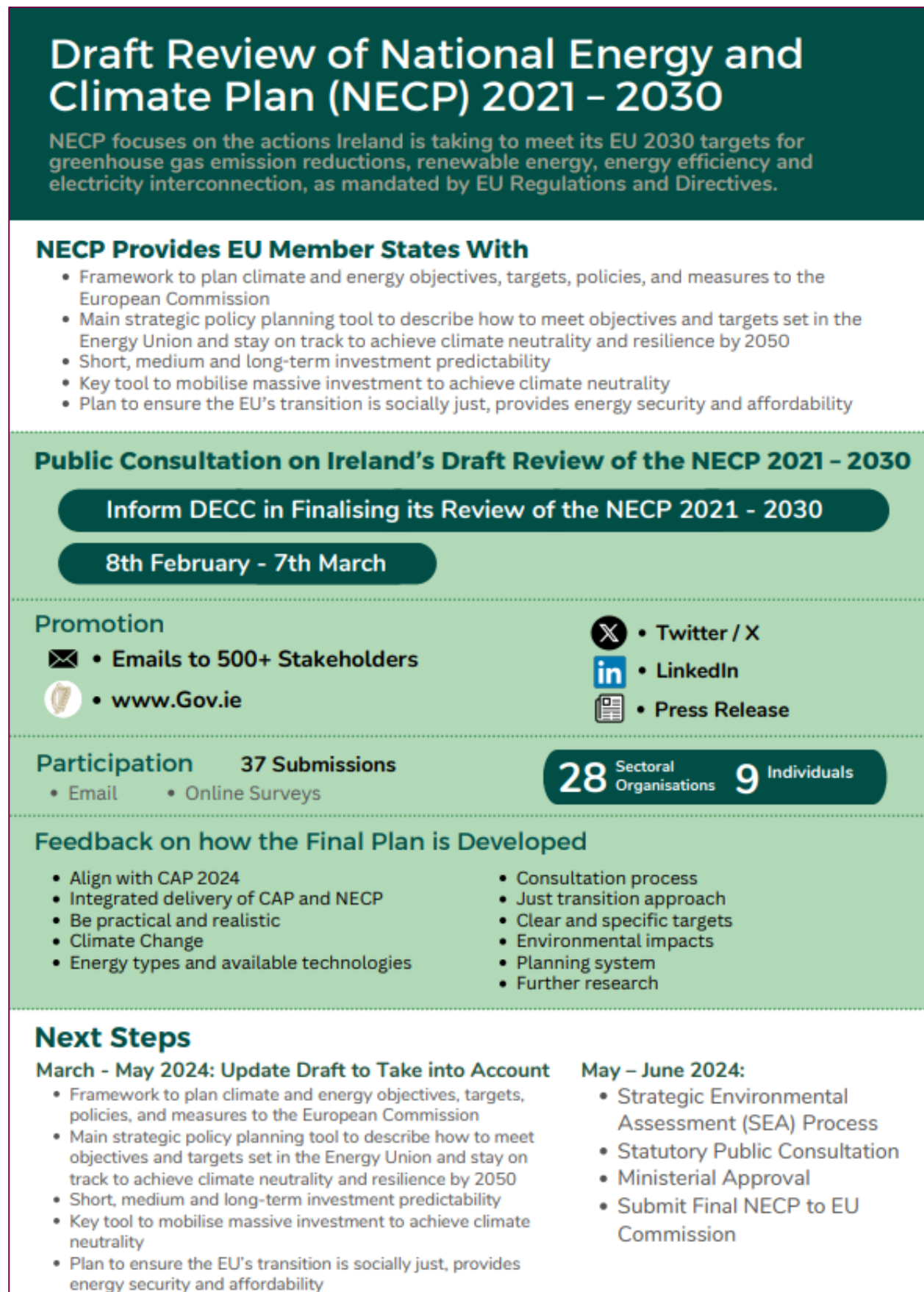
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The adequacy of the consultation process around the draft plan was also commented on by various respondents, with views expressed on shortcomings around timing and accessibility in particular. Recommendations were put forward for improvements that could be made in future consultations.

Overall, the breadth of engagement and level of detail contained in submissions demonstrates the interest that exists in this key plan and provides practical suggestions for consideration by the Department as it moves towards preparation of the final plan.

## 1.1 Summary Infographic



## 2 PROMOTION AND PARTICIPATION

### 2.1 Online Presence

The Department established an online NECP Public Consultation page on Gov.ie that went live on 8 February 2024.

The consultation webpage included functionality to receive consultation submissions from 8 February 2024 until 7 March 2024.

It also included information under the following topics:

- Consultation overview
- Background
- How to make a submission
- Data Protection.

### 2.2 Participation in this Public Consultation

Submissions were received by email and through the online survey.

A total of 37 organisations / individuals made submissions. These were primarily from sectoral organisations, as well as from individuals. Of the submissions received, one organisation submitted three separate responses (the Environmental Justice Network Ireland). Submissions from individuals included one from a group of academics, lawyers and NGOs made a joint submission.

Please see Appendix A for a list of all organisations that made submissions during the focused period of public consultation.

We noted that four submissions were received after the deadline and these were therefore not analysed in detail for this report (see Appendix A).

### 2.3 Promotion

The public consultation was publicised and promoted through both direct and indirect methods of communications, as follows.

#### 2.3.1 Direct Emails

DECC compiled a database of over 500 stakeholders, comprising public sector, industry, transport, education, youth, food / agriculture, energy, community, NGO, and others.

Emails were issued to these stakeholders on a number of occasions between December 2023 and March 2024, to advise them of the process, invite their participation and notify them of key dates for the public consultation.

On 12 February 2024 the following email was sent to over 200 stakeholders from [necp@decc.gov.ie](mailto:necp@decc.gov.ie):

A Chara,

*The Department of the Environment, Climate and Communications invites you to participate in a consultation on the draft National Energy & Climate Plan (NECP) 2021-2030. The draft NECP brings together Ireland's energy and climate targets and initiatives under EU legislation into one framework.*

*The closing date for submissions is 17.30 Thursday 7 March 2024.*

*Submissions should be sent by email only to [necp@decc.gov.ie](mailto:necp@decc.gov.ie) with the subject line 'NECP Consultation'.*

*To read the draft NECP and to find out how to make a submission, please visit our consultation webpage.*

*About the NECP*



Since finalising the first NECP in 2019, the Irish Government has built on the plan and continued to engage and consult widely with individual members of the public and key stakeholders on energy and climate change policy.

This consultation forms a key component of the NECP process, which will culminate with the submission of a final NECP to the European Commission in June 2024. Ireland submitted its draft NECP to the Commission in 2023. The feedback from the Commission's assessment of the draft, in addition to the feedback from the stakeholder consultation, will be reflected in the final NECP.

As the document evolves to incorporate these changes, along with the integration of Ireland's new, more ambitious European targets and updated policies, it is anticipated that the final NECP will represent a substantially developed update to the draft which was submitted in December 2023. A further consultation will be carried out prior to the submission of the final NECP, to ensure that stakeholders are kept informed about the process and are given opportunity to contribute to the shaping of this document.

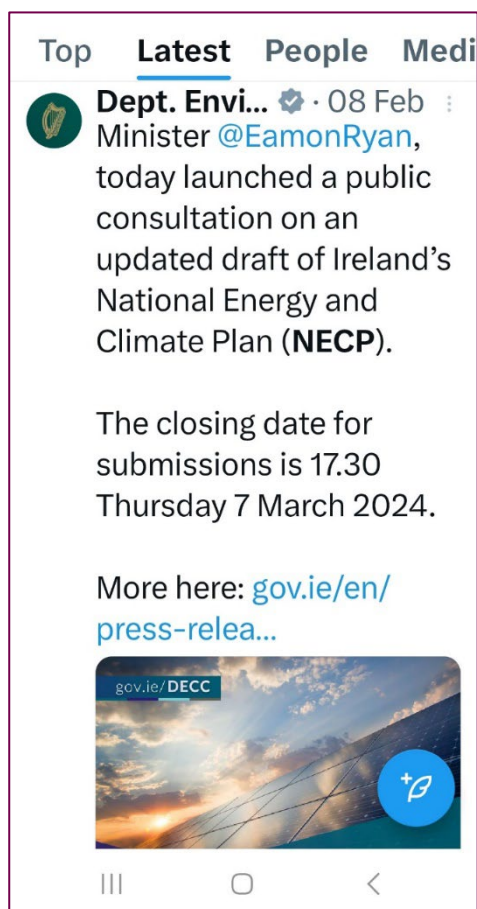
If you require any further information about the NECP or the consultation, please contact the NECP team in DECC at [necp@decc.gov.ie](mailto:necp@decc.gov.ie)

Yours faithfully,

Kevin Sheridan

### 2.3.2 Social Media – NECP Tweets on X

The Department posted two organic tweets from its X account on 08/02/2024 and on 07/03/2024. The posts are displayed below.





### 2.3.3 Social Media - NECP on LinkedIn

One organic post was published on DECC's LinkedIn account on 08/02/2024 as follows:



### 2.3.4 Traditional Media – Press Release

The Department issued a press release (see below) to launch the public consultation on 8 February 2024. This was published on the Gov.ie website – see <https://www.gov.ie/en/press-release/709a2-minister-ryan-launches-consultation-on-irelands-draft-national-energy-and-climate-plan/>.

#### *Press Release*

#### ***Minister Ryan launches consultation on Ireland's Draft National Energy and Climate Plan***

*The draft NECP brings together Ireland's energy and climate targets and initiatives under EU legislation into one framework*

*The Minister for the Environment, Climate and Communications, Eamon Ryan, today (Thursday, 8 February) launched a [public consultation on an updated draft of Ireland's National Energy and Climate Plan \(NECP\)](#).*

*All European Union (EU) Member States, including Ireland, develop NECPs to outline progress towards their climate and energy objectives and targets under EU legislation.*

*The NECP, which covers the period from 2021 to 2030, focuses on the actions Ireland is taking to meet its EU 2030 targets for greenhouse gas emission reductions, renewable energy, energy efficiency and electricity interconnection, as mandated by EU Regulations and Directives. The aim of this consultation is to engage stakeholders and gather valuable feedback that will inform and shape a final version of the NECP.*

*Commenting on the opening of the consultation, Minister Ryan said:*

*"Engagement with stakeholders is central to the success of the NECP and climate action plans. While the NECP projections are based on 2021 implemented policies, in accordance with EU Guidelines, I am conscious that this is not as ambitious as our own recent 2024 climate action plan. Therefore, I encourage all stakeholders to be ambitious and to share their valuable feedback with us to help shape a robust response to our EU targets for greenhouse gas emissions reductions, renewable energy, energy efficiency and electricity interconnection. The final NECP will reflect most recent projections and our future ambition."*

*This consultation forms a key component of the NECP process, which will culminate with the submission of a final NECP to the European Commission in June 2024. Ireland submitted its draft NECP to the Commission in 2023. The feedback from the Commission's assessment of the draft, in addition to the feedback from the stakeholder consultation, will be reflected in the final NECP.*

*As the document evolves to incorporate these changes, along with the integration of Ireland's new, more ambitious European targets and updated policies, it is anticipated that the final NECP will represent a substantially developed update to the draft which was submitted in December 2023.*

*A further consultation will be carried out prior to the submission of the final NECP, to ensure that stakeholders are kept informed on the process and are given opportunity to contribute to the shaping of this document.*

*For information on how to make a submission to the NECP consultation, please visit the [Department of the Environment, Climate and Communications website](#).*

### 3 FEEDBACK RECEIVED

#### 3.1 Methodology and Approach to Analysing Feedback

The following sections present a detailed summary of the written feedback received during the public consultation period on the draft NECP, held from 8 February to 7 March 2024.

All feedback has been analysed and presented in this report. The feedback gathered has been broken down thematically, to highlight the issues raised by respondents, with a total of 11 themes identified. The themes are presented in alphabetical order, but this does not suggest an order of priority. All feedback is considered equally by DECC and its project team, in addition to the outputs from its environmental and technical studies, towards developing a final NECP.

Individual responses have been anonymised, while submissions from organisations have been attributed for the purpose of this Public Consultation Findings Report.

#### 3.2 Quantifiers

For this Public Consultation Findings Report, the total number of responses and the number of times a theme was mentioned has been collated to reflect the importance of each issue to participants. Quantifiers have been applied as per the Table below. A total of 37 organisations / individuals provided responses to the public consultation – see Appendix A for a list of the organisations who made submissions.

Respondent Quantity	Descriptor
0-1	A respondent
2-10	A few respondents
11-20	A number of respondents
21-30	Many respondents
30+	Most respondents

#### 3.3 Theme 1: Agriculture

A few respondents expressed that further consideration of the agricultural sector is needed in the final plan.

The Irish Creamery Milk Suppliers Association (ICMSA) commented on a further need to evaluate the resources “required to comply with the NECP”. The respondent claimed that “some of the choices that must be made are not possible,” observing that requirements outlined by the NECP would “require additional land or significant change of land use from current enterprises”. The submission recommended that a further “significant” consultation should be undertaken to determine what gets priority within the plan and to gauge views on the associated impacts on rural communities.

In the joint briefing compiled by The Environmental Justice Network Ireland (EJNI), Friends of the Earth Ireland and the Centre for Environmental Justice<sup>1</sup>, it was expressed the view that the draft NECP did not adequately address questions relating to agriculture. Citing research conducted by the Environment Pillar and An Taisce, they stated that the updated version needs to include a plan for a “more resilient agro-ecological transition”. Specifically, they highlighted a “number of key omissions” from the draft, including the provision of a plan for a low-carbon transition to a balanced agro-ecological system to 2030 and 2050. In addition, the submission stated that the draft plan overlooks “major bioenergy sustainability failures” arising

<sup>1</sup> [05. Brennan, Daly, Devitt, Hough, Kelleher, McIlhennon, Price.pdf](#)

from “poor forest management, biomass imports and methane losses in anaerobic digestion”. Within this, they highlighted that the draft plan has an important role in ensuring that the agricultural sector respects environmental and social boundaries.

The respondent acknowledged that the NECP has a key role in ensuring that the agriculture sector respects “both environmental and social boundaries”.

### 3.4 Theme 2: Approach to Developing the NECP

A few respondents requested further clarification on certain aspects of the draft NECP, with recommendations and suggestions made for improvements in the final plan.

Science Foundation Ireland (SFI) claimed that further clarity is needed on the rationale and overall objective of the NECP “so that all stakeholders have an agreed understanding and can align implementation plans accordingly”.

RWE Renewables Ireland Ltd. (RWE) recommended that further detail be included in the final plan on areas such as “future onshore grid reinforcement and changes to the connection process and firm access”. More information on the timing and scale of recruitment and resource allocation for “key stakeholders” was also suggested for inclusion in the revised NECP. They suggested that the proposals set out in the draft NECP, as well as those put forward in CAP24 documents, be included in the final versions of both respective plans. The publication and implementation of storage, private wire policies and lowering current RES-E constraint levels were specifically mentioned with regard to this. This submission also referenced Ofgem and its position regarding the concept of UK-Ireland Interconnectors, emphasising that alternative approaches must be integrated into the revised document.

EJNl questioned the approach and asked that the Department aligns the NECP process with domestic climate planning in a “more transparent and accessible way”. The group asked for the draft to be revised alongside an “updated and significantly improved” long-term strategic implementation plan. They highlighted that the plan is missing “any factoring in of mitigation effects from the initiatives outlined in CAP24” and an outline of up-to-date emissions’ sectoral pathways and projections for decarbonisation beyond 2030, which, they stated, is required under Article 27 of the Governance Regulation.

A list of actions was presented in the joint briefing submitted by the ENJI, FOE, and the CEJ. The briefing asserted that the updated plan should comply with recommendations made by the European Commission on foot of the draft version. They also highlighted that there are data gaps throughout the draft plan, for example on emission projections, scenarios, pathways and carbon budgets. They asked that the DECC publish the missing data to show a “transparently quantified roadmap”. In addition, it was requested that there be a demonstration of how the national objectives and targets and measures included in the plan would meet the first two five-year carbon budgets “without fail”. Clarification on how Ireland intends using carbon dioxide removal was also proposed. Furthermore, it was requested that a “rights based” approach to updating the NECP should be considered.

The Irish Road Haulage Association (IRHA) expressed a view that the draft plan was not realistic. Their submission acknowledged a requirement for ambitious measures to reach carbon reduction targets but stated that without plans that are “firmly rooted in practical realities” project outcomes will fail in meeting these objectives. Similarly, another submission stated that the proposed plan does not address related issues “with the urgency necessary”. The respondent asserted that the suggested measures are “not concrete or not enforceable enough”.

An Taisce also questioned the approach taken, expressing an opinion that the draft plan didn’t provide “a plan with policies and actions that demonstrably meet Ireland’s carbon budgets to 2025 and 2030”. They stated that the draft plan “lacks up-to-date and complete data and emission reduction pathway scenarios”. It was also claimed that it does not align with the National Long-Term Strategy and that this needs to be achieved in the final plan. The group also pointed out that the draft has not “analysed the mitigating effects of the various actions and initiatives contained in the Climate Action Plan 2024”, stating that such analysis must

be completed to ensure alignment between measures proposed in the NECP and sectoral emission reduction obligations. An Taisce further recommended that the Department implement all actions included in the joint briefing submitted by the ENJI, FOE and the CEJ.

Fáilte Ireland highlighted that tourism is referenced just once in the draft plan, in the context of sustainability, under the section on 'Macroeconomics.' They stated that tourism has been "flagged as a gap in the National Climate Adaptation Framework review document in 2022" and more detail on tourism is therefore proposed for the final plan.

The ICMSA expressed concern over the "glaring omission" of aviation issues from the draft. They stated that this exclusion suggests a two-tier policy regime which they consider "unacceptable".

RDGATA, in their submission to the consultation, outlined their support for policy objectives to secure sectoral reductions in carbon. However, the group asked that the NECP recognise the "practical limitations" to businesses and assist them with necessary investments to achieve carbon reduction objectives. The submission highlighted that it is important that the NECP is "aligned with national planning policy and is supportive of sustainable development" and asked that the NECP examine the "unintended adverse consequences" that certain policies, intended to achieve climate action targets, may have. Furthermore, they claimed that a focus on active travel in urban areas has isolated local shops and reduced their accessibility, leading to an increase in private car travel to larger retail outlets.

### 3.5 Theme 3: Approach to NECP Targets

A few respondents observed that the targets in the draft plan prioritise long-term objectives over short-term ones. The IRHA stated that the draft's current approach to reducing carbon is based on an "idealistic utopian long-term vision" and that short- to medium-term targets have been "ignored". Remarking that it "falls short of achievable goals", they asserted that without a focus on a short-term initiative, the identified emissions reduction objectives would not be met. Another submission expressed that the plan should include "specific targets, which are clear and enforceable".

Claims were made in a few submissions that the WEM and WAM scenarios were not sufficient in the draft plan. It was expressed by Zero Waste Alliance Ireland (ZWA) that the plan's WEM scenario is "not enough to meet the GHG emission targets necessary to meet the demands of current climate change". They proposed that more focus be placed on the WAM pathway in the final plan. Similarly, Gas Networks Ireland (GNI) recommended that the WAM scenario modelling within the plan should be ambitious enough to allow the national targets to be met. They referenced the European Commission review of the draft plan, which outlined that the WAM scenario contained in the draft plan was 13.1% short of the 2030 EU ESR targets. The Electricity Association of Ireland (EAI) also referred to the European Commission review of the draft plan, stating that "Ireland is not on track to meet its 2030 obligations" and highlighting that action is needed to get back on track to meet them.

In the joint briefing submitted on behalf of the ENJI, it was stated that as the draft plan is based on WEM scenarios up to 2030, the final plan depends on "future inclusion of a revised WAM scenario from 2021 to an unspecified date". They also observed that it is "unclear" from the current draft if the scenarios in the final NECP will "adhere to the WAM scenarios outlined in CAP24". The submission expressed concern over the reliance of both WEM and WAM scenarios on ESRI models that use "speculative future energy prices", as this introduces a "high level of uncertainty" into the plan. They referenced the 2019 NECP, claiming that "it failed to outline any detailed plans for the emissions reductions required over this decade, and it failed to address the social and economic risks associated with a delayed, or slower transition". They also expressed concern over the draft plan lacking assurance of near-term and consistent reductions in line with national and EU targets, as this puts Ireland off track to achieve net zero emissions by 2050. Clear sectoral pathways and interim targets to ensure progress were suggested as potential additions to the final plan. The submission also proposed better alignment with "FAIR data principles", to aid in enhancing transparency, and suggested the inclusion of a NECP spreadsheet to achieve this.



### 3.6 Theme 4: Circular Economy

The relationship between the circular economy and the capacity to reduce existing greenhouse gas emissions levels was highlighted by a few respondents.

In their submission, the Rediscovery Centre acknowledged that “the circular economy holds a large potential for climate change mitigation”, commenting that “recirculating products reduces greenhouse gas emissions as it negates the need for new products”. The respondent made a number of further observations and suggestions on this theme, as follows:

- That business models wherein items are shared, or sold as a service, “also reduce carbon emissions by keeping products in use for longer”;
- That it was “vital” to include measures within the plan for reducing environmental impacts in the textiles industry. They observed that a circular economy approach would reduce “the quantity of post-consumer textiles recovered through incineration or exported for recycling/disposal in landfill”;
- That emissions due to transport could be reduced where demand for new products is reduced;
- That research funding be increased, to quantify “the potential carbon emissions reductions from circular activities” and to understand how the quantification of circular activities affects national emissions reporting, something they described as “crucial”. Stating that there is a “significant knowledge gap” in this area, they also called for additional research in quantifying “repair activities taking place in the country”.

The link between energy and waste/resource management was highlighted by ZWAI, who described them as “intimately connected”. They stated that “extraction, transformation, transport, processing, manufacturing” are significant stages in the production and consumption of an item and claimed that the energy used in these stages could “be used more beneficially or avoided completely” if a circular-based approach was considered.

### 3.7 Theme 5: Climate Change

A few submissions addressed the theme of climate change and highlighted recommendations for improving its integration into the final plan.

One submission suggested that a report outlining the potential impacts on the environment could be included in addition to the plan. Feedback from Connect the Dots highlighted the need for the document to address the “main offenders of pollution” in the country and queried how the most impactful actions are determined. The respondent also queried if stakeholders would be required to take action in proportion to their contribution to climate change. Another respondent expressed the view that the draft plan is “entirely inadequate” in addressing the pressing issue of climate change.

The opportunity to use the designation of Cork and Dublin within the EU Cities Mission initiative to advance their decarbonisation was presented in one submission by Cork Chamber. It was stated that Cork is “particularly at risk to flooding” and referenced a recent storm which impacted the city. It was suggested that nature-based solutions should be considered, where possible, to aid in dealing with the biodiversity crisis. The respondent also called for “greater integration” of citizen engagement within the plan.

The Irish Countrywomen’s Association (ICA) asked that the plan consider the potential benefits that reducing speed limits could have on cutting tailpipe emissions, referencing their recent increase. It was claimed that this would “bring many extra benefits to society” and outlined a list of these benefits. Feedback from the Rediscovery Centre proposed that a “greater emphasis on the role of prevention” in the reduction of GHG emissions be incorporated into the plan. Within this, it was highlighted that reduced consumption from industrial and commercial activities has the potential to reduce emissions.

SFI stated that climate action is a collective responsibility across all sectors but that “the Government and Local Government have a responsibility to show leadership and to drive change”.

The environmental impacts of offshore renewable energy (ORE) were highlighted in a submission by BirdWatch Ireland, the detail of which is included under Section 3.8.1 of this document. In addition to these specific points around ORE, BirdWatch Ireland also suggested that the draft NECP foreword could “do more to strengthen and reinforce the interplay between climate action and nature recovery”, suggesting that “the Minister should frame the role of our oceans as a powerful ally in the fight against climate change, especially in the context of energy”.

### 3.8 Theme 6: Energy

The theme of energy was a major recurring one within the submissions received, with a broad range of topics touched on by a number of respondents.

A few submissions highlighted the potential for hybrid connections to be incorporated into the final plan. Both EAI and Bord na Móna highlighted that the draft plan made no mention of hybrid connections and their potential to unlock thousands of megawatts of renewable capacity at existing windfarms and conventional connection points. The EAI proposed that a “renewed sense of urgency” around hybrid connections should be acknowledged in the final NECP.

Biomethane production was referenced in a few submissions. GNI proposed an increased ambition for biomethane production and suggested the potential to include a detailed section on the National Biomethane Strategy.

The Irish Bioenergy Association expressed the view that the draft plan does not place enough emphasis on the role bioenergy can play in decarbonisation and emissions reduction. They stated that the plan is “heavily focused on electricity and electrification”. The submission welcomed the inclusion of bioenergy data in the draft plan but highlighted that certain tables referencing it were blank (e.g., Biomass availability). They highlighted that clarification is needed for the biomethane target and the trajectory for delivery. They asked that DECC prioritise more detail on the Renewable Heat Obligation in the final plan. The submission also referenced biogas and stated that the plan should include details of how biogas plants are going to be supported. Specific reference to Bioenergy Carbon Capture and Storage (BCESS) and biochar in LULUCF emissions reduction targets was also made. The overall recommendation from the submission was for the role of bioliquids and biogases to be expanded in the final NECP.

Bord na Móna asked that DECC consider the importance of grid enhancement in speeding up the uptake of new renewable energy capacity. They stated that rapid grid expansion is needed for this, and that Government should take an “anticipatory approach to investment, basing investment plans on 2040 network planning timescales, as opposed to 2030”. A strategic focus on co-location of renewable generation, large demand customers, low-carbon technologies and pairing storage technologies was proposed for the final plan.

The EAI highlighted Ireland's increased energy savings target under the recast Energy Efficiency Directive (EED) and suggested a mix of Energy Efficiency Obligation Scheme (EEOS) and Alternative Measures (AMs) to meet it. They pointed out that a gap currently exists between expected and obligated savings, which has been impacted by supply chain issues. As a result of this, they suggested that there should not be an increase to the current EEOS target. Private wires were cited as another solution to the heavily constrained grid, with the respondent also proposing that mitigations for cost and programme impacts be put in place to protect developers. The submission also pointed out the need for the plan to consider the construction of connection assets relating to offshore development. They expressed the view that ORE projects reliant on a third party to deliver high-quality grid connection on time “introduces additional grid risk”.

The inclusion of Key Performance Indicators (KPIs) and an electrification indicator in the final plan was highlighted by Bord na Móna and the EAI, to assist in the “quantification and assessment of the electrification process”. The EAI further emphasised that an electrification indicator would provide an “evidence base” on where progress has been made and highlight where opportunities exist to “intensify action”.



GNI proposed that the final plan highlight the benefits of co-location of large energy users. Hydrogen production was also touched on, with GNI suggesting that a national network would facilitate the export of green hydrogen. They also proposed that the updated plan should include an update on the Strategic Emergency Gas Reserve proposal which GNI are currently working on.

In the joint briefing submitted on behalf of the ENJI, it was stated that while climate and energy transition investments were acknowledged in the draft NECP, a comprehensive outline of investment was needed for the final plan. It was proposed that this should address the investment needs of the five dimensions of the Energy Union. They suggested that the assessment could also cover: the financing needs of all policies, specification of how public funding will be used and private investment mobilised, and how EU financial instruments will align with the plan. It was expressed that the draft plan “does not provide enough detail on these crucial issues”.

The Demand Response Aggregators of Ireland called for clarification on the current status of energy payments for DSUs in the electricity market. They presented proposed alternative text for inclusion in the final plan, outlining the most recent status update on this topic.

Cork Chamber’s submission called for support for Cork Harbour in becoming an “international renewables hub” within the scope of the plan. They also asked for the Just Transition Commission to be fast-tracked and a plan put in place to ensure the responsibilities placed on each sector are being met.

EDF Renewables asked that DECC consider increasing the penetration of renewable energy beyond the 80% committed in the Climate Action Plan 2024 (CAP24). They presented a list of measures to achieve this, including a “clear and stable support scheme” which would allow an increase in the penetration of RES-E beyond 80% by 2030. A “stable and expanded grid” to access areas that have poor grid infrastructure was also proposed, alongside the minimisation of dispatch down by ensuring “sufficient transmission capacity”. Other measures suggested by EDF included having a streamlined planning system, market redesign, cross-departmental collaboration, a centralised approach to offshore policy and system flexibility. Clarity on future RESS/ORESS auction schedules and consistent annual delivery of onshore wind and solar were points also highlighted. One individual provided feedback on the distance of onshore wind farms from residential areas.

ESB Networks provided a range of insights and highlighted recommendations from the European Commission within their submission. Feedback included efforts to increase flexibility in the electricity system, procuring additional electricity storage, ensuring network capacity for renewables and low carbon technologies, and facilitating distributed connected generation. They stated that certain elements of the plan require further updating. For instance, the solar target needs clarification to align with the Climate Action Plan 2024 and updates are also needed for the National Smart Metering Programme (NSMP) targets, they said. They offered to provide assistance in updating these elements of the plan and highlighted their efforts regarding demand flexibility, energy security, network capacity, accelerating renewables, and small-scale renewables.

Liquid Gas Ireland (LGI) expressed the view that the lack of access to the natural gas grid poses significant challenges for consumers wanting to decarbonise, especially in rural areas. LGI’s submission outlined how lower carbon options like LPG and renewable BioLPG can assist in decarbonisation efforts in off-grid areas, contributing to national GHG emissions reductions. They highlighted that these options could offer cleaner, more sustainable alternatives to heating oil and coal. They proposed a “mixed technology” approach that includes both heat pump technology and liquid gas options to provide rural consumers with greater choice and facilitate a just transition. They also proposed that transitioning from high carbon fuels to lower-emission, renewable-ready gas boilers could be a viable option for heating system upgrades. LGI highlighted the importance of including LPG and BioLPG in the final plan, and stated that both should be recognised as affordable lower carbon fuel options across various sectors to meet national climate targets. They highlighted rDME, a blendable product with LPG and BioLPG, as a key future tool for emissions reduction.

One respondent noted the importance of implementing measures to address energy demands from data centres, including setting a cap on energy usage and ensuring flexibility without relying on fossil fuels. Not Here Not Anywhere emphasised the need for new centres to utilise renewable energy sources and for

existing centres to transition rapidly to renewable energy. In addition, they highlighted the potential of utilising heat generated from data centres for district heating systems. In terms of decarbonisation efforts, the respondent suggested phasing out fossil fuel infrastructure, banning fracked gas, and the prioritisation of renewable energy projects. They also proposed incentivising community energy initiatives and prioritising energy poverty prevention. Furthermore, they highlighted the importance of participatory decision-making processes for energy projects, with a focus on including marginalised groups. The respondent also recognised the role of green hydrogen in sectors that are difficult to decarbonise.

Similarly, ZWAI expressed concern over the high energy consumption of data centres and stated that “the mining of cryptocurrencies should be banned”. They also stated that the term “waste” should include waste from energy and not just discarded materials, and pointed out that inefficient use of waste is environmentally damaging. Submitting that “no form of renewable or sustainable energy is climate neutral”, they expressed the view that Ireland has failed to “adequately implement the Circular Economy”.

A submission from RGDATA called for new schemes to support retrofitting due to the high cost of energy. They also called on the CRU to enhance its oversight of energy prices for businesses and show readiness to intervene to ensure price reductions.

RWE asserted that the Government need to ensure “the earliest possible transposition of the Renewable Energy Directive”. It was highlighted that, without this, it will be challenging for Ireland to achieve the targets outlined in CAP24 and EU targets for Effort Sharing.

One submission referred to Sustainable Aviation Fuels (SAF). SFS Ireland proposed that a more detailed plan is needed for the aviation sector on the development of Power-to-Liquid fuel and stated that this would assist in driving investment and planning. It was proposed that the SAF working group could potentially assist in building a framework for SAF deployment in Ireland.

A view was expressed by BirdWatch Ireland that the draft NECP contains no clear plans for the demand reduction of renewables which “play a critical part of decarbonisation efforts”. They further stated that energy saving, energy efficiency and reduced energy demand should be included in the plan’s new demand strategy project.

A submission from SuperNode suggested that superconducting cables should be considered in the final plan, as current grid technologies are capacity constrained and may hinder the chance of meeting targets. They highlighted the economic benefits that could arise from Ireland positioning itself as a hub for these advancements and proposed that the Government act on the grid technology gap promptly to leverage these opportunities.

Feedback from the ICMSA highlighted that the plan had a “lack of focus” on microgeneration, which could make a significant contribution to the rural economy. It was requested that greater emphasis be placed on this in the final plan.

One submission raised the issue of energy of buildings. ZWAI suggested that improvements regarding energy costs should first be made to public offices such as civil service buildings, claiming that many of these units are “older, less efficient buildings in terms of energy usage”. Their submission stated that “In 2022 only one of 238 office buildings occupied by Government Departments and agencies has achieved an A rating for energy efficiency”. The respondent called for an “energy usage review” to be conducted on such Government buildings with new procedures for lighting and heating usage “on floors no longer in use due to working from home” to be instated thereafter. The respondent stated that “a very significant use of fossil fuels is for heating older houses” and observed that retrofitting all such housing units simultaneously would be unfeasible due to associated costs and resource limitations. They suggested a “retrofit” pilot scheme approach, recommending that the Government first “look at the rural or small-town areas with the highest reliance on fossil fuels and target a couple of them”. The submission proposed that “a few high profile retrofit pilots might help to get other areas or homes to be upgraded”. Pointing to the capital costs of retrofits, they claimed that without a “drastic” increase in grant funding available “many rural homes will not be able to afford the switch to a heat pump from oil or solid fuel”.

### 3.8.1 Environmental Impacts of Offshore Renewable Energy (ORE)

The environmental impacts of ORE were highlighted in one submission. BirdWatch Ireland expressed their support for rapid decarbonisation and the transition away from fossil fuels toward renewable energy sources such as offshore wind but emphasised the need for sensitive planning to minimise negative impacts on ecosystems and biodiversity. They expressed concern that the draft NECP lacks sufficient detail regarding Strategic Environmental Impact Assessments and Appropriate Assessments for ORE projects, expressing the view that this could hinder effective planning for ORE projects.

They called for a “context-specific approach” that incorporates stakeholder input and considers cumulative impacts, particularly on seabirds and their habitats. They advocated for the application of the Precautionary Principle to ORE development to adequately assess environmental risks, and expressed concern that the draft plan does not address this principle. They also highlighted that there is no reference to the Marine Protected Areas (MPA) legislation in the NECP and commented that the “complete absence” of the MPA Bill suggests “that there is not full alignment between departments or coherence between plans for the development of the ORE”. The group also expressed significant concern about the draft’s discussion of the South Coast DMAP process. They claimed it overlooks how this process will take account of nationally derived and EU-derived MPAs.

## 3.9 Theme 7: Just Transition

Some submissions received did not accept that the updated NECP had provided a detailed plan for achieving a just transition in Ireland. Energy poverty was a recurring theme in these submissions, with respondents claiming that existing measures included in the draft were not sufficient, either in scope or detail, to address energy needs.

The EJNI said that there was an overall lack of “strategic and forward-looking vision” in the plan policies, adding that the report “shows a lack of assessment of the socio-economic impacts on individuals, households and companies”. The respondent asserted that, in the absence of a more detailed report, they were unable to assess the merits of the draft NECP as a framework for a just energy transition. The respondent did not feel that the proposed measures in the Energy Poverty Action Plan (EPAP) were sufficient to address existing needs over extended periods, categorising these as “largely one-off, short-term measures, indicating a crisis-oriented response to energy poverty”. It was asserted that “this approach has previously been criticised by the European Commission”. The respondent also put forward a view that the draft NECP had “not aligned” with previous recommendations by the Commission with respect to addressing energy poverty in the state. It suggested that the “lack of legal safeguards undermines accountability and long-term political commitment”, as the EPAP does not have any statutory footing. The respondent recommended the establishment of a “Just Transition Commission” to “examine specific just transition challenges and provide potential solutions to mitigate against these challenges”.

ZWAI did not regard the scope of previous consultation efforts as sufficient, explaining that, without further consideration of just transition policies, there will be “important consequences for the legitimacy, effectiveness and success of Ireland’s plan”. The respondent suggested that without this further consultation “The measures proposed are not equality-proofed against the experience of the life of the average citizen”. It was asserted that existing proposals had not fully considered potential impacts on small businesses “below tax registration thresholds” or those operating in a rural “shadow economy,” particularly in relation to Midland “peat-based” economies. They stated that a just transition policy should include greater consideration for smaller operations in these economies and that existing plans “focussed almost exclusively on the economic impact of large industrial scale peat industry”. The respondent described the updated NECP as having “missed many important measures to alleviate poverty and energy poverty driven by rising costs”. It was cited that “only 35-40% of all houses in Ireland have a Building Energy Rating” and that further research was therefore required in relation to the existing housing stock to comprehensively address energy poverty and understand the level of investment required.

One submission made reference to just transition in the transport sector. The IRHA expressed the view that DECC and the Department of Transport have not “based their policy positions on grounded facts that apply to the transport sector”. The respondent claimed that zero carbon technology is not currently accessible at large scale for the transport sector and that a just transition approach is “required in the interim”.

### 3.10 Theme 8: Planning

Both Bord na Móna and the EAI observed that the current planning permission system has “lengthy decision-making timelines” that have the potential to “jeopardise project feasibility and deliverability”. Bord na Móna stated that planning system reforms are “eagerly anticipated” by industry and pointed to the recent success of the RePowerEU deadline mandate and the National Planning and Development Bill. They also stated that the inclusion of strategies to expedite planning reform is of key importance for the final plan. Similarly, the ICMSA emphasised that the planning system needs to be “adapted quickly” in order for the NECP to be successful, while EDF Renewables highlighted the need to have a quicker planning process by reducing timelines to 18 weeks.

The EAI asked that an acknowledgment of the alignment between energy policy and the planning process be considered. They claimed that the lack of an efficient planning system poses a risk to prospective investors. Furthermore, they highlighted that the designation of MPAs and DMAPs is not yet finished and observed that this is a source of uncertainty within the ORE development industry. They proposed that these plans be expedited in order for Ireland to achieve its ORE targets. Additionally, they highlighted the need for a transparent and well-resourced planning system, stating that, without this, Ireland’s future energy security and climate ambitions are “at risk”.

RWE requested clarity on revisions to, and delivery of, planning rules, such as the National Development Framework, the Renewable Electricity Spatial Policy Framework, revised Wind Energy Development Guidelines and publication of the South Coast DMAP. They also requested clarity for onshore renewables, stating that there is “no visibility of future auctions beyond RESPF in 2025”.

### 3.11 Theme 9: Public Consultation Process

In their submission, the ICA affirmed their willingness as an organisation to “assist in any way we can in any efforts made to inform the public on climate action”. They cited previous success in campaigns promoting improved access to electrical and water utilities in rural Ireland over the decades. The submission commented on the need for consideration of “human behaviour patterns” when designing plans such as the NECP. Furthermore, they stated principles of effective leadership, including “educating, guiding and inspiring others” which should be applied to consultations such as the NECP.

On the other hand, feedback from a number of consultees indicated dissatisfaction with the consultation process for the draft NECP.

Submissions from An Taisce, BirdWatch Ireland, the EJNI and ZWAI expressed negative views regarding the timing of the consultation, as well as the overall process by Ireland for reviewing the NECP.

The duration / time available to engage in the public consultation was raised. These stakeholders also questioned the timeline for when the consultation was held vis a vis the other work being undertaken on the NECP.

Fáilte Ireland asserted that the process was “confusing”, adding that it was difficult to discern how the draft NECP differed from and/or related to existing Government climate policy. ICTU and Connect the Dots expressed dissatisfaction with the accessibility of the draft plan, in terms of its size and structure.

The Consultation Questionnaire also generated some negative views, including a belief that it was a restrictive format for stakeholders to provide feedback.

### 3.12 Theme 10: Research for Consideration

A few submissions highlighted areas for additional research that could be considered in the final plan. For example, Fáilte Ireland proposed the integration of the UN Sustainable Development Goals (SDGs) into the plan. They suggested that doing this would ensure that climate action aligns with other important policy objectives. Furthermore, they suggested that it would be beneficial to understand where in the NECP the framing of cross-sectoral tourism activities fits in.

SFI highlighted the importance of trans/interdisciplinary research in supporting transformational change. They referred to the outputs of a recent Government of Ireland campaign, “Creating our Future”, which effectively demonstrated the important role of the public in the context of research aimed at addressing the climate and energy crisis.

BirdWatch Ireland observed that the NECP highlights the need for effective co-ordination of national environmental research priorities. They observed a gap in data on potential impacts of ORE on seabirds and proposed that high-quality data from conservation organisations be integrated into the final plan. They also expressed that there is insufficient Government support for data collection efforts by NGOs, which is hindering effective decision-making. They proposed that the Government enhance NGO participation in marine spatial planning and ensure the accessibility of collected data to inform future offshore wind development and conservation efforts.

## 4 CONCLUSION AND NEXT STEPS

### 4.1 Key Takeaways from the Public Consultation

This plan – and the measures contained within it for meeting our carbon emissions reduction targets – is critical for our energy future and it is important that the NECP balances a wide range of considerations and elements, some of which were not adequately addressed in the draft that was subject to public consultation in early 2024. These include:

- Being practical and realistic in its proposals, as well as ambitious;
- Fully aligning with the CAP 2024 and setting out an integrated approach to delivery of both;
- Ensuring that targets are clear and specific and are across short- and medium-term timeframes, as well as long-term;
- Considering the potential for environmental impacts, including unintended ones, from the measures (and technologies) set out;
- Ensuring fairness to all sectors of society through a “just transition” approach and, in particular, adequately addressing the issue of energy poverty;
- Addressing inadequacies in the planning system, particularly around decision-making timelines and resourcing, so that necessary projects can be delivered in line with targets;
- Considering all available technologies and forms of energy in its scope, in order to achieve its ambitious targets;
- Demonstrating urgency and broad thinking in relation to the pressing issue of climate change;
- Considering areas in which further research could be usefully included in its scope; and
- Making the public consultation process more accessible and ensuring its timing and duration are adequate, to maximise participation.

#### 4.1.1 Key Elements Called for by Respondents

- Further consideration of the agricultural sector;
- Greater clarity, so that there is a common understanding of what is being set out and how it will be achieved and to ensure alignment with other policies, plans and processes;
- Sufficiently ambitious measures and policies that ensure Ireland remains on track to deliver on its national and EU targets;
- Greater consideration and integration of a circular economy approach in the final plan;
- Greater emphasis on the role of prevention in the reduction of GHG emissions, including reduced consumption from industrial and commercial activities;
- Improved accessibility in the consultation process;
- Greater consideration of specific energy-related topics such as: hybrid connections, hydrogen production, microgeneration, biomethane and bioenergy, grid enhancement, LPG and BioLPG, the energy consumption of data centres, and financing and investment to support implementation of energy policies.

### 4.2 Next Steps

DECC has considered all submissions and feedback received during the public consultation. It has also taken into account additional technical studies and other newly available materials including the European Commission Recommendations on the draft NECP 2021-2030, the Draft National Biomethane Strategy, Irelands Energy Efficiency Directive, Irelands Climate Change Assessment Report, Synthesis report and Volume’s 1-4; and modelling undertaken by SEAI and EPA to inform the WEM and WAM scenarios, to



further inform its approach to finalising the NECP. The European Commission's feedback on the 2023 draft will also be addressed.

Having considered the above, DECC will bring a further Updated Draft NECP through the Oireachtas for consideration, and another period of focused public consultation will be held in early Summer 2024.

The Final NECP will be subject to Ministerial review and approval.

Where feedback arose that is not directly relevant to the NECP, the Department will provide this to the relevant other sections within DECC or to other Departments, as appropriate.



## 5 RESPONSE BY DECC TO FEEDBACK RECEIVED

National Energy and Climate Plans are the framework within which European Member States must notify their climate and energy objectives, targets, policies, and measures to the European Commission and were established under Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action. Member States are required to develop NECPs on a ten-year rolling basis. The aim of the plans is to outline our energy and climate policies in detail for the period from 2021 to 2030 and provide projections and ambitions towards 2050. Under the Regulation, Member States are also required to update their initial plans after 5 years, this is the first update of the initial NECP published in 2019.

The NECP covers five dimensions of the Energy Union:

- Decarbonisation
- Energy Efficiency
- Energy Security
- Internal Energy Market
- Research, Innovation and Competitiveness

The NECP brings together the policies, targets, tools and associated material relating to our climate and energy obligations under various EU Regulations and Directives from across Government bodies and Departments into one document. It reflects our ambitions and provides certainty to investors and policymakers that we are committed to EU-wide targets and ambitions to move towards becoming a carbon-neutral society.

The Department of the Environment, Climate and Communications has led on developing Ireland's NECP but, given the broad and cross-Departmental nature of the policies and commitments contained within the plan, has done so collaboratively with input and consultations with other Government Departments and State Agencies in relevant areas. The NECP team in DECC has also engaged more broadly with representatives from the European Commission, other Member States and the UK to ensure regional collaboration and understanding on shared issues of importance.

The next Updated Draft NECP will reflect the ambitions set out in Climate Action Plan 24. Whereas the CAP is updated to reflect new policies and measures to increase Ireland's ambitions in pursuing energy and climate targets, the NECP acts more as a collation of existing policies and an analysis of how we are performing relative to EU-wide targets, including projections on how we expect to perform in future years based on current trajectories. The NECP will act to identify gaps and areas that Ireland can improve on, which should be reflected in updated policies and measures in subsequent CAPs. The policies outlined in the Updated Draft NECP will reflect the ambition of Climate Action Plan 24. However, due to the criteria set by the Commission the modelling does not simply reflect one Climate Action Plan.

The modelling underpinning the Updated Draft NECP has been carried out by the Sustainable Energy Authority of Ireland (SEAI) and the Environmental Protection Agency (EPA) based on two potential scenarios: the With Existing Measures (WEM) scenario and the With Additional Measures (WAM) scenario. Definitions are as follow:

- WEM: Measures **committed** to by Government. Measure must be in place before the end of the latest Inventory year (2022).
- WAM: Assumes implementation of the WEM in addition to measures in **Government Plans including CAP 2024**

Although there are restrictions on what policies and measures can be included in our projection figures, the NECP also acts as a measure of our ambition to close any gaps identified in the projections. We have received feedback from numerous sources, both across Government and from stakeholder responses to consultation, and have updated the draft NECP to provide a more robust and all-encompassing vision of Ireland's energy and climate ambitions. The next Updated Draft NECP should provide a solid background on Ireland's approach to energy and climate issues and should act as a signal to other Governments, and stakeholders from industry to private citizens that we recognise the huge challenges involved in moving

towards a carbon-neutral and climate-resilient society and are actively taking steps to close the gap between our current policies and measures and the targets that are set at the EU level.

As the NECP does not introduce new policy, the approach to the NECP has been to utilise and build on the existing and extensive policy specific consultations and other consultative process, such as the National Dialogue on Climate Action that have been carried out since the first NECP (2019). These consultations have been supplemented by two four-week consultations and a digital event. This is also part of the wider consultation strategy that has sought to engage other Member States and the UK.

We have also sought to build on the first consultation by addressing as many of the points raised during feedback as possible and within the limitations of the NECP document. As the NECP is using existing policies and initiatives, feedback relative to distinct policy areas will be formally fed back to those teams or departments to review and action as appropriate through the domestic policy cycle. The updated material in the Updated Draft NECP will address many of the points raised around the incomplete nature of the first draft.

A strong consideration for Government is that any ambition in reducing emissions or increasing renewable energy use do not leave any of our citizens behind. The principles of Just Transition are embedded in the NECP and the Commission have noted that Ireland's approach to areas such as energy poverty are important in ensuring that the wellbeing of citizens is not compromised despite the large societal and industrial shifts that need to occur in order to hit our ambitious targets. DECC are committed to ensuring that no one is left behind and that Irish society as a whole can both participate and benefit from the policies and measures, we are enacting to reach our energy and climate targets.

In response to feedback regarding the appropriateness of sending the Draft NECP to the EU before undertaking Strategic Environmental Assessment (SEA), the Department has always planned to undertake SEA and in line with the SEA Directive, this is being undertaken on the Updated Draft NECP.

Feedback regarding the public consultation process will inform the next stage of focused public consultation. We are planning a digital event (webinar) during the second consultation that will provide further context to the plan.

Contrary to assertions in feedback received, DECC did accept submissions in other formats, apart from the consultation survey. These were received from a few stakeholders and have been analysed and reported on in this report. The next stage of public consultation will clearly state how submissions can be made and an email address will be provided, along with the survey questionnaire.

When published, hard copies of the Updated Draft NECP will be on display at Department of the Environment, Climate and Communications, Tom Johnson House, Beggars Bush Barracks, Haddington Road, Dublin 4, D04 K7X4.

## 6 APPENDICES

## **Appendix A: List of Organisations that made a Submission / Responded to Survey**

### Submissions Received from Organisations between 8 February and 7 March 2024

1	An Taisce
2	BirdWatch Ireland
3	Bord na Móna
4	Climate Bar Association
5	Connect the Dots
6	Cork Chamber
7	Demand Response Aggregators of Ireland
8	EDF Renewables Ireland
9	Electricity Association of Ireland
10	Environmental Justice Network Ireland (EJNI)
11	ESB Networks
12	Fáilte Ireland
13	Gas Networks Ireland
14	Irish Bioenergy Association
15	Irish Congress of Trade Unions (ICTU)
16	Irish Countrywomen's Association (ICA)
17	Irish Creamery Milk Suppliers Association (ICMSA)
18	Irish Road Haulage Association (IRHA)
19	Liquid Gas Ireland
20	Maeve Thornberry & Associates
21	Not Here Anywhere (NHNA)

22 Rediscovery Centre

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23 RGDATA

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24 RWE Renewables Ireland Ltd.

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25 Science Foundation Ireland (SFI)

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26 SFS Ireland

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27 SuperNode

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28 Zero Waste Alliance Ireland

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### **Additional Submissions received after the deadline**

1 Department for Communities Northern Ireland

2 Energia

3 Northern Ireland Environment Agency

4 Voice for Vision Impairment

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## **Appendix B: Press Release and Advertisements Promoting the Public Consultation**



## Appendix C: Glossary of Terms

AM	Alternative Measures
ORE	Offshore Renewable Energy
CAP	Climate Action Plan
CEJ	Centre for Environmental Justice
CRU	Commission for Regulation of Utilities
DECC	Department of Enterprise Trade and Employment
DMAP	Designated Maritime Area Plan
DMAP	Designated Maritime Area Plan
DoT	Department of Transport
DSU	Demand Side Unit
EAI	Electricity Association of Ireland
EC	European Commission
EED	Energy Efficiency Directive
EEOS	Energy Efficiency Obligation Scheme
EJNI	Environmental Justice Network Ireland
FOE	Friends of the Earth Ireland
GHG	Greenhouse Gas
GNI	Gas Networks Ireland
ICA	Irish Countrywomen's Association
IRHA	Irish Road Haulage Association
KPI	Key Performance Indicator
LGI	Liquid Gas Ireland
LPG	Liquified Petroleum Gas
MPAs	Marine Protected Areas
NECP	National Energy and Climate Plan
NGO	Non-Governmental Organisations
NSMP	National Smart Metering Programme
ORESS	Offshore Renewable Electricity Support Scheme
rDME	Recycled Carbon Dimethyl Ether
RE	Renewable Energy
RESPF	Renewable Electricity Spatial Policy Framework
RESS	Renewable Electricity Support Scheme
SAF	Sustainable Aviation Fuels
SFI	Science Foundation Ireland
UAEC	Unrealised Available Energy Compensation
WAM	With Additional Measures
WEM	With Existing Measures
ZWAI	Zero Waste Alliance Ireland

