

1. In Ireland's Greenhouse Gas Emissions Projections 2025-2030, the EPA now projects for the first time that we are close to meeting our first carbon budget, following a consistent trend of improving projections for that budget over recent years. In your view, which policies and measures have been the most successful in reducing Ireland's GHG emissions?

The overall news on Carbon budgets is that while Ireland is close to achieving it's first carbon budget, the 2030 targets with existing measures are "extremely challenging" according to the EPA. This means that the low hanging fruit has been picked and we are left primarily with the hard decisions.

A review of the sectoral analysis shows that the Energy industry has had the greatest change, with increasing renewable energy and interconnectors with the neighbouring countries supporting this. These gains however are threatened by increasing power demand through the expansion of Data centres.

VOICE work on waste reduction and circular economy, and recognise that the extraction, use and disposal of material is the core of our triple planetary crisis, linked to biodiversity loss, Climate change and pollution. Without addressing our economic model we cannot meaningfully address carbon reductions or a just transition.

45% of CO₂ emissions globally come from the making, processing use and disposal of materials and food. The major achievement in the last National Climate Action plan report was the publishing of the Circular Economy Strategy²⁶⁻²⁸. While this is a notable achievement though it comes a year late and still includes actions that are well over due (1 of 7 CE linked actions within the Climate Action plan are marked as complete).

2. Among the measures identified in Climate Action Plan 2024 and Climate Action Plan 2025, which do you consider the highest priority to close the gap to 2030?

VOICE argue that the key areas will be in transitioning to a circular economy, so concentrating on the CE targets within the plan, as this will change the economic model to one that supports doing more with less, and keeping materials in use at their highest value. Irelands current CMUR rate at 2.4% is the lowest in Europe, so there is significant work that can be done to improve this area which benefits circular economy and carbon emissions across all sectors. Ensuring that these changes are embedded across government and not siloed into the Department of Climate & Transport.

Since the transport and environment portfolios have been under one TD since 2020, first under Eamonn Ryann and now Darragh O'Brien, this results in a siloed approach to the Climate Action Plan. The remainder of government is responsible for just 25% of the actions, and no actions lead by any other department are marked as completed.

The Circularity Gap report for Ireland 2024, noted that the two biggest drivers of carbon emissions within the Circular economy space are food and construction sectors. For Ireland, C&D waste makes over 50% of our waste generation nationally, and accounts for 11% of our carbon footprint.

The green construction roadmap has been delayed for some years now, but has potential to lead the way in more sustainable, less wasteful and less carbon intensive building practices for Ireland. As we face into a housing crisis, the publication and implementation of this is all the more important. The results from this will likely take a number of years to filter through, and so an earlier start and strong backing are crucially to seeing results from this sector. The CGR for Ireland shows a pathway to 17% CO₂ reduction for the sector, which would support carbon reduction in the Built environment and industry sectors.

Food waste is similarly a significant issue in Ireland with a significant impact on carbon budgets. Similarly a food waste roadmap is out for consultation but moving beyond consultation to changes across the chain from agriculture, processing, selling to use is needed in order to significantly reduce the carbon impact of this sector.

Finally municipal waste per person is growing in Ireland, with the inclusion of Incineration in the EU ETS scheme, our waste treatments will have a significant impact in how we achieve carbon goals. Ensuring that policies reflect material reduction in the first instance, material reuse and recycling, and disincentivise the landfilling, incineration or exporting to markets unable to manage the waste, will play a significant role in not just supporting our carbon targets, but doing so in a way that does not off shore the problems to other countries and communities to deal with the extraction and disposal.

3. In the key sectoral areas identified (Electricity, Transport, Industry, Buildings, Agriculture and Land Use), what additional actions to those already in CAP 24 and CAP 25 could, in your view, accelerate delivery in these areas?

The climate action plan measures outputs, but to date has not addressed the drivers of those carbon emissions.

Reuse rates and participation, secondary material market share, material footprint per capita, would help to illustrate and drive the changes in carbon produced across the sectors.

Green public procurement has begun to exhibit a strong lever on national acceptance of reuse and sustainability within contracts. Expanding this and using this as a measure within the Climate Action Plan to show carbon reductions through policy would be a significant development.

4. *In addition to the priority areas you have already identified in previous questions, which other areas should this update to the Climate Action Plan focus on?*

VOICE believe there is an opportunity to increasingly embed circular economy into the Climate Action Plan process, as material consumption is one of the key drivers for carbon emissions. CAP26 should support the development of Resue infrastructure through investment, and the reform of EPR schemes to ensure that reuse and reduction targets are within their mandates. Food waste should also be a priority area within the climate action plan, due to it's significant local and global impact on carbon emissions.

5. *The Joint Oireachtas Committee on Climate, Environment and Energy published a Report on Barriers to Achieving Climate Targets (2026-30) in February. Do you agree with the findings of this Report? What other barriers to achieving the climate targets, if any, would you identify? How best can the identified barriers be addressed?*

Agriculture, the stakeholders consulted mean the outputs are heavily skewed to beef and dairy and afforestation rather than looking at whole system changes.

Transport, once again highlights the issue of private car use. The signal to government is deep investment in public transport and active travel schemes, over all other forms of transport. This has been shown by the last government to be popular and effective, though taking political will power.

On EVs, the other observation to make would be not alone prioritising the development of charging infrastructure but developing options for households without front of door parking. There are a number of approaches that can be taken here from reduced rates at public chargers, to developing the infrastructure to address the problem (eg lamp-post chargers, footpath linked charge points etc.)

Industry – leadership is the key missing point here, the example of the Single use cup levy is a piece of legislation announced in 2022, which would require businesses to invest in a change of operations, however it has been backtracked, delayed, reannounced, and changed numerous times over the last number of years. This does not send the signal to industry that the government is serious about significant change. On the contrary the implementation of the DRS shows that when the direction and timing is set significant change can be achieved at a national scale, providing supports and engagement with stakeholders are in place throughout.

6. The principles of a Just Transition (evidence-base and structured; skills and opportunity; fair sharing of costs; social dialogue and lived experience) are explained by the Just Transition Commission. What are your views on how these principles can be incorporated into the next CAP or climate action more generally?

VOICE support the actions outlined in the just transition Commissions letter to the govt. on 13/07/2026 include listing Just Transition as a priority objective, adoption of updated definition, and commitment to deliver the National Just Transition Strategy should all be supported.

The actions proposed by the Just Transition Commission are consistent with the Environmental Justice Principles as put forward by the Global Anti Incineration Alliance (GAIA, of which VOICE is a member), notably meaningful participation, social dialogue, accountability, community resilience and crucially systems change.

Climate change is a global issue, action in Ireland or in parts of Ireland that leave other communities behind actively work against the aims of climate action planning. Ensuring that a just transition is embedded into the very framework of the climate action plan is crucial to ensuring it's success. Without a whole of community buy in, and ensuring that we are heling furthest behind first, we cannot achieve the aims laid out in the plans.

Embedding the principles outlined in the report will ensure that we do not 'offshore' our carbon emissions to other countries which can have a net additive effect on the global scale or build resentment to the plans on the local scale. Indeed the expansion of reuse, refurbishment and repair within a circular economy framework offers opportunities for employment within the just transition principles.

Ensuring that these principles are embedded and actively worked on through the plan will also support Irelands work on achieving the Sustainable Development Goals therefore the incorporation of these principles ensures greater policy coherence.

7. The National Adaptation Framework and the Sectoral Adaptation Plans have been published. To what extent should further climate change adaptation measures be included in the next CAP?

It is clear that the next CAP needs to do more to accelerate decarbonisation, since many of the carbon savings are not seen for some time after the implementation of the measures, there needs to also be a focus on more immediate measures to give an indication to stakeholders and society that the appropriate steps are being taken. This means an increased focus on Circular Economy indicators as measures not just of adaptation and carbon reduction but also societal resilience.

VOICE believe a focus should be placed on resource reduction, repair and reuse systems, circular construction initiatives, safer materials, but at the very core community led circular economy initiatives. These measures reduce our reliance on global supply chains, support public and environmental health, wellbeing and adaptation.

Significant work was undertaken by the Circular Economy Gap Report for Ireland which highlights the priority areas that can deliver positives for carbon, waste reduction and circular economy. The CAP should also include circular economy indicators, to better reflect the relationship between resource use, climate and emissions reductions.

<https://ec.europa.eu/eusurvey/runner/d132f7c0-eb0e-4ce8-87c5-7efd0d2b2cbf?draftid=7472319a-f49d-48b3-8b49-2a374f37b7be>