



Stop Climate Chaos Coalition  
9 Upper Mount Street  
Dublin 2

Minister Eamon Ryan, TD  
Department of Environment, Climate and Communications  
29-31 Adelaide Rd  
Dublin D02 X285

3 March 2023

Dear Minister Ryan,

### **RE: Ireland's upcoming NECP Progress Report and Revision**

We write to you in relation to the upcoming progress report on Ireland's National Energy and Climate Plan, due for submission to the European Commission before March 15<sup>th</sup>, 2023.

According to Article 17(1) of Regulation (EU) 2018/1999 (the Governance Regulation), Ireland must report every two years on the status of implementation of its NECP by means of an integrated progress report covering the related and mutually reinforcing five dimensions of the Energy Union. Ireland must also follow the structure, format, and technical details as set out in the Commission Implementing Regulation (EU) 2022/2299, which sets the rules for the application of the Governance Regulation. This is the first national report of progress in implementing NECPs since the Governance Regulation was adopted, and in addition to the upcoming crucial mid-term revision, is a major accountability moment on achievement of national and EU climate targets and of the European Green Deal.

It is within this context that it is imperative your Department and the Government:

#### **1. Maximise the opportunity that NECP progress reporting provides**

As you are aware, NECPs provide a powerful instrument to accelerate climate action and ensure coherence and consistency in policies aimed at achieving the goals of the Paris Agreement. The climate context, at national and EU level, has evolved substantially compared to 2019, when Ireland's NECP was originally drafted. Ireland's NECP is out of date; it does not reflect current Government policy and falls far short of increased EU ambition by 2030. The revision of Ireland's NECP (the first draft of which is due by June 30<sup>th</sup>, 2023) is therefore an opportunity for the Government to ensure the plan is on a near-term emissions reduction pathway aligned with higher EU ambition and takes account of the long-term goal more acutely.

Overall, the Government should draw lessons from the reporting process. The preparation of Ireland's NECP progress report will provide an important assessment that will identify the significant implementation gaps (considering Ireland's NECP is out of date) and inform where increased ambition and financing is needed in the revised plan. NECP progress reports will also be a key source for the Commission's assessment (under Article 29 of Regulation 2018/1999)

(expected October 31st, 2023) of progress made towards the Energy Union's targets, by Ireland towards meeting its objectives and targets set out in its initial NECP, and the resulting emissions gap. The Government should welcome this feedback process as an opportunity to inform the upcoming revision process. It is also of vital importance that the Government embraces the reporting requirement not as a data exercise in compliance with EU law, but rather as a key strategic moment to ensure accountability and set the necessary groundwork to raise ambition in line with higher EU 2030 targets and the Paris Agreement.

## **2. Provide detailed and comprehensive data and information on all aspects of Ireland's NECP implementation.**

Review and transparency are at the core of the Paris Agreement, and review and transparency also provide an essential basis for addressing the urgency, complexity, and long-term nature of the climate challenge. Central to this is the need to evaluate progress over the short, medium, and long term to ensure that the Government can enhance policies and their implementation.

We urge the Government to ensure that high quality and reliable data and information is provided, on the policies and measures related to implementation of Ireland's NECP, and that this includes reporting on all key areas, including the social dimensions of the NECP template. Ireland's progress report must provide comprehensive and full information on:

- Progress towards reaching national contributions to the EU's climate and energy objectives across all sectors, including renewable energy, energy efficiency, energy security, and curbing greenhouse gas emissions.
- Policies and measures adopted to meet those targets and objectives in each sector, including just transition aspects, and an assessment of remaining gaps.
- Financing policies and measures (including a review of actual investment versus initial investment assumptions).
- Policies and measures to meet objectives on research, development, and competitiveness, including progress towards the national objectives to phase out fossil fuel subsidies.
- Impact of NECP policies and measures on air quality and on emissions of air pollutants.

Making progress reports accessible to the public is a binding obligation for Member States (Article 17 (6) of the Governance Regulation). Therefore, the information reported must be sufficiently detailed and thorough and the report must be submitted to the Commission no later than March 16th, 2023. To ensure transparency and promote public participation, we call on the Government to ensure that the progress report uploaded on the Commissions reporting platform (Reportnet 3) is available for downloading. This will ensure that citizens are fully aware of any deficits in implementation progress and the extent to which Ireland is on track to meeting its climate obligations.

## **3. Report fully on progress towards reducing energy poverty across Ireland**

The Government is also expected to detail in the progress report, the policies and actions to reduce the number of households in energy poverty, including inequalities in energy poverty. Since the publication of Ireland's NECP in 2020, energy poverty has become a widespread national concern. It is essential therefore that progress reporting on energy poverty be used to identify

where there are significant information and implementation gaps in providing wrap-around supports for improving energy efficiency. The upcoming revision of the NECP must build on the recently published Energy Poverty Action Plan to deliver long-term strategic energy and social policy measures to tackle energy poverty effectively. This will need to include how the Government plans to ensure that steps taken to phase out fossil fuel subsidies will not affect efforts to reduce energy poverty.

#### **4. Report fully on progress towards ensuring climate justice and a fair transition**

The NECP progress reporting template provides an integrated reporting mechanism on climate justice and a just transition. The Government should therefore ensure that it provides comprehensive information on if and how the NECP contributes to climate justice and fair and just transition. As per reporting guidelines, this will need to include information on the protection of human rights and promotion of social inclusion; enhancement of wellbeing and equality; balanced regional development; and universal economic benefits. These are significantly important considerations which will need to be addressed in the revised NECP. Ireland's revised NECP will need to clearly adopt a whole-of-society and granular approach to ensuring an equitable and just transition.

#### **5. Draw lessons from progress on public participation to improve the NECP revision**

Ireland is required to comply with the minimum requirements for public participation set by the Aarhus Convention. The NECP progress reports require the Government to outline progress made on establishing an effective platform of multilevel public participation and dialogue on the scenarios required to achieve Ireland's climate objectives. Given the considerable changes in Irish climate governance and policy since the drafting and publication of Ireland's NECP in 2019/2020, the Government will need to substantially improve public participation during the upcoming revision process. As part of the NECP revision process, the Government must provide timely, inclusive, and meaningful opportunities for citizen and stakeholder dialogue before the revised and final draft NECPs are submitted to the European Commission.

Minister, in light of these important considerations, we kindly request a meeting with your officials to discuss in further detail, Ireland's NECP progress report and the upcoming NECP revision.

Yours sincerely,



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