

Report Card 2023: Is the Government keeping its word on climate and environment?

Friends of the Earth Ireland

Last update: 2/8/2023 C. Augustenborg, P. Deane, D. Torney

Methodology: In July 2023, Friends of the Earth commissioned three academic experts to independently assess the Irish Government's performance on environment and climate relative to commitments in the 2020 Programme for Government (PfG). The PfG contains nearly 300 environmental or climate related commitments. Friends of the Earth divided these commitments into nine categories: *Climate; Nature and Biodiversity; Waste and the Circular Economy; Water and Marine; Air Quality; Transport; Buildings; Energy; and Agriculture and Forestry*. More than 85 stakeholders across a wide range of civil society organizations, sectoral interest groups, political parties, academic institutions, media organizations and Government bodies were contacted to gather data and insights on each of the Government's environmental commitments. Forty three stakeholder interviews were conducted along with extensive desk-based independent research, all of which is reported in a compendium developed by Patricia Lentz, Emma Flannery, Isabelle Hargrave and Clara Weldon of University College Dublin. Three academic experts then used the information in this compendium along with their own knowledge of Government policy to score each of the nine categories. Their assessment *did not* evaluate whether commitments contained in the PfG were adequate, but rather how well this Government is keeping its word on their *own* climate and environmental promises. The assessment took into account that the current Government has served for three years while the PfG was developed based on a five year timescale. Thus, performance was evaluated based on the level of policy development and implementation which could reasonably be expected within three years. This assessment has been conducted annually since 2021 to measure progress over the duration of the PfG.

The experts commissioned for Report Card 2021- 2023 were:

- Dr. Cara Augustenborg (Chair), Assistant Professor, Environmental Policy Programme, University College Dublin
- Dr. Diarmuid Torney, Associate Professor, School of Law and Government, Dublin City University
- Dr. Paul Deane, Senior Lecturer in Clean Energy Futures, MaREI, University College Cork.

Report Card 2023 (Scores out of 10)

	2023			2022			2021	
Climate	6.0	Moderate		6.0	Moderate		7.5	Good
Nature and Biodiversity	6.5	Moderate		6.5	Moderate		4.5	Poor
Water and Marine	5.0	Poor		4.5	Poor		5.5	Moderate
Waste and Circular Economy	7.5	Good		8.5	Excellent		8.5	Excellent
Air Quality	7.0	Good		7.0	Good		7.0	Good
Transport	6.5	Moderate		7.0	Good		6.5	Moderate
Buildings	7.0	Good		6.0	Moderate		6.5	Moderate
Energy	7.0	Good		4.0	Poor		6.0	Moderate
Agriculture and Forestry	4.0	Poor		4.0	Poor		4.0	Poor
Overall	C+	Moderate		C	Moderate		C+	Moderate

Overall assessment: Approximately two-thirds of the way into this Government's term, their performance in achieving their own environmental commitments received a C+ grade overall, up from a C last year. While there is cause for hope from the overall result of this year's review, there is no cause for celebration as Ireland is still well behind where we need to be with respect to climate and environmental action.

- **Improvements:** Significant progress was made in Energy related commitments compared to last year (from 4 to 7), along with moderate improvement in Buildings (from 6 to 7) and marginal improvement in Marine commitments (from 5 to 5.5, see Water & Marine section below).
- **Declines:** There was a moderate decline in performance in the Waste sector (from 8.5 to 7.5) due to lack of clear implementation after an excellent start in policy development and a slight decline in progress on Transport commitments (from 7 to 6.5) due to lack of spending on active transport infrastructure and a rebound of greenhouse gas emissions in this sector.
- **No change:** Climate and Air Quality commitments demonstrated similar progress compared to 2022, with Climate commitments achieving moderate progress (6 out of 10) and Air Quality commitments achieving good progress (7 out of 10). As with last year, the Agriculture and Forestry commitments demonstrated poor progress (4 out of 10), and the Government continues to flirt with failure in this area. Progress in Drinking and Waste Water commitments achieved the same poor score as last year (4 out of 10, see Water & Marine section below) since the Water Framework Directive continues to be neglected. However, investment in water infrastructure has improved.

Overall, the improved grade of C+ reflects additional effort and investment on environmental commitments by the Government this year. While the Government's attentiveness to environmental issues is clearly improving, it is still a long way off where it could be and where it needs to be.

Critically-endangered commitments: The judges identified for the first time some important commitments now in danger of not being achieved by the Government over its five-year term. Specifically:

- **On the Government's Climate commitments:** There is a high likelihood that Ireland will not meet its commitments on the first carbon budget and the sectoral emissions ceilings. Solutions do exist. The Government needs to implement the Climate Action Plan in full and scale up the actions we are undertaking already. In addition, more clarity regarding the legal consequences of failing to meet these commitments; better cross-departmental collaboration; and improved climate engagement between the Government and the public in communicating the need and rationale for climate measures would all support the likelihood of achieving this critical promise to the people of Ireland.
- **On the Government's Nature and Biodiversity commitments:** The recent recommendations from both the Citizens' Assembly on Biodiversity Loss and the Children and Young People's Assembly on Biodiversity Loss affirmed the Government's own commitment to "*Promote biodiversity initiatives across primary, post-primary and third-level sectors, and ensure that schools, colleges, and universities across the country play an active role in providing areas to promote biodiversity.*" Urgent engagement to develop stronger education and awareness offerings on nature and biodiversity across all levels of education is needed to achieve this commitment.
- **On the Government's Drinking and Waste Water commitments:** A majority of Ireland's rivers, lakes and estuaries are failing to meet Water Framework Directive standards in contrast to the Government's own promise to "*ensure that the State complies with the EU Water Framework Directive*". The [EPA's water quality indicators report](#) confirms that Ireland's water quality worsened in 2022 compared to 2021, with dangerous nitrate and phosphate concentrations in many of Ireland's river sites, estuarine, and coastal water bodies. This was primarily attributed to intensive agricultural activities, wastewater discharges, and agricultural run-off.

Better catchment-wide planning, River Basin Management Plans, and guidance to local authorities could help address this serious environmental and public health issue.

- **On the Government's Agriculture and Forestry commitments:** The Government's agri-environmental commitments favor a business-as-usual approach with minimal transformation of the current food production system. Even with such limited ambition, the State is still largely failing to achieve its own promises. While greenhouse gas emissions reduced slightly in the agricultural sector in 2022, this was driven by high fertiliser costs rather than policy interventions and could easily rebound in the future as prices stabilize. More proactive interventions and less complacency by the Government is essential for agriculture to achieve its emission reduction targets and play its part in improving water quality. In addition, adaptation to future climate change must be given more consideration regarding risks to food production.

Quotes by the experts

Dr. Cara Augustenborg (Chair): *"We're accustomed to hearing nothing but bad news when it comes to Ireland's environmental record, but taking a deep dive inside the Government's work since 2020 provides clear evidence that progress is being made to improve Ireland's environmental health in most areas. It's frustrating that this work is not yet apparent in people's lives and we're not seeing the transformational changes needed to address the climate and biodiversity emergency. However, if Government doubles down on their efforts through intense and sustained effort, we could be living in a more sustainable Ireland within the decade. The question is whether or not the Government's will is strong enough to accomplish this in the short time remaining."*

Dr. Paul Deane: *"This year's review gives us cause for hope but not a reason for celebration. Ireland's greenhouse gas pollution has reduced marginally this year, but we are still massively addicted to fossil fuels. However, we are seeing a positive foundation for a cleaner future being put in place. The task for the Government this year is not just climate action but climate agility. Many of the correct actions are being taken but just not at a speed that is quick enough or a scale that is large enough."*

Dr. Diarmuid Torney: *"Three years on from the formation of the Government, we see a mixed picture. Although a good foundation is being laid and there is solid progress in some areas, overall delivery is slower than I would have liked to see approximately two thirds of the way through the Government's term in office. Time is running short to deliver on the range of climate and environmental commitments set out in the Programme for Government and there needs to be a real prioritisation of environment and climate over the remainder of the Government's term."*

Summary of Analysis

Climate (6 / 10): Progress continues on climate change, particularly with respect to financing and resourcing commitments. Recent emissions reductions are welcome but still far from what has been promised, and an updated National Adaptation Framework is overdue. Climate engagement with youth has improved significantly. Unfortunately, delays in 2021-2022 in setting "the rules of the game" when it comes to climate governance have had a knock on effect in achieving other climate commitments. Thus, the Government's progress on its climate commitments remain just "Moderate" this year similar to last year.

	2023		2022		2021	
Climate - Overall	6.0 / 10	Moderate	6.0 / 10	Moderate	7.5 / 10	Good
Governance	6.5 / 10		6.5 / 10		8.0 / 10	
Emissions	4.5 / 10		4.0 / 10		6.0 / 10	
Adaptation	4.0 / 10		4.5 / 10		4.5 / 10	
Funding	8.0 / 10		8.0 / 10		8.0 / 10	

Governance (6.5 / 10): Climate commitments are now driven by science-based targets through the Government's 2021 Climate Act. The Government weathered the energy crisis and are continuing to develop climate plans to address new sectoral emissions ceilings, but long delays in establishing climate governance "rules of the game" have delayed subsequent climate actions. Shortfalls remain with respect to setting sectoral land use targets and reducing emissions in line with legislation. The dwindling likelihood of achieving the first carbon budgets is a significant concern, as is the lack of a Just Transition Commission and the delay in submitting a draft updated National Energy and Climate Plan to the European Commission. Climate engagement with young people has been strengthened considerably this year.

Emissions (4.5 / 10): Emissions dropped approximately 2% between 2021 and 2022 and this accounts for a slight increase in the score for this category from last year, but clearly significant shortfalls remain in achieving emissions targets. EPA projections indicate Ireland emissions would fall by 29% by 2030 compared to 2018 levels, 22% short of our legally binding 2030 target of 51%, even if all planned measures are implemented. Performance in this category continues to remain poor.

Adaptation (4 / 10): There are very few commitments related to Adaptation in the PfG and it is disappointing that an updated National Adaptation Framework has still not been published. Current adaptation plans remain insufficient to meet the challenge of our changing climate. Improvement in this category is dependent on the outcomes of the National Adaptation Framework.

Funding (8 / 10): Substantial funding was allocated to climate action again this year, including to support businesses in lowering their emissions through solar and energy efficiency grants and to provide more resources to county councils and relevant Government and semi-state bodies to work on climate issues. Carbon tax increases have continued as committed to in the PfG and are now legislated as part of the Finance Act. The Government has been consistent in their funding of climate action for the past three years and this is a strength.

Nature & Biodiversity (6.5 / 10): Significant progress in this category began in 2021 and has been sustained in 2022, particularly in the conclusion of the Citizens' Assembly on Biodiversity Loss; reform of the National Parks and Wildlife Service; development of many local nature projects; peatland rewetting investments; progress on invasive species management and adoption of the Wildlife Amendment Bill. Commitments that appear neglected include the commitments for Urban Biodiversity plans, including pesticide usage and biodiversity education. Improvement in this category is largely dependent on the outcomes of the upcoming fourth National Biodiversity Action Plan.

Water & Marine (5 / 10): Water quality continues to deteriorate and insufficient progress is being made on the Government's commitments to improve water quality. However, commitments in the marine area and in drinking and waste water infrastructure have progressed more this year than last year, accounting for a marginal increase in the score for this category.

	2023		2022		2021	
Water and Marine - Overall	5.0 / 10	Poor	4.5 / 10	Poor	5.5 / 10	Moderate
Drinking and Waste Water	4.0 / 10		4.0 / 10		5.0 / 10	
Marine	5.5 / 10		5.0 / 10		6.0 / 10	

Drinking and Waste Water (4 / 10): There have been some positive developments in drinking water commitments with record investment in Uisce Éireann and progress on wastewater treatment plants, leak reduction efforts, and community water schemes. However, lack of compliance with the EU Water Framework Directive remains a serious concern, in addition to a lack of progress on water conservation commitments and delayed publication of River Basin Management Plans. The critical issue of nitrogen and phosphorus loads in water bodies is still not being addressed, and water quality continues to decline, posing both environmental and health risks that must be urgently resolved to avoid failure in this area.

Marine (5.5 / 10): Structures are now in place for Marine Planning and Development and the Government showed strong leadership in taking a plan led approach to offshore renewable development. Overfishing continues, but there have been improvements in enforcement. There has been some progress on Marine Protected Areas but legislation is overdue. The establishment of the new Maritime Area Regulatory Authority (MARA) is welcomed and expected to accelerate developments in this area from July 2023.

Waste and Circular Economy (7.5 / 10): After demonstrating excellent progress developing strong policies in this area in 2021-2022, it has been disappointing that these policies have yet to be realized “on the ground” in transforming Ireland’s relationship with waste. Progress on Extended Producer Responsibility and creation of a Circular Economy Unit within Government this year are welcomed, along with the passing of the Circular Economy Act in 2022. However, there has been slow progress on public procurement, revisions to the tax system, and consideration of removing VAT on repair. The introduction of a latte levy and deposit and return scheme are expected soon, but progress in this area seems to have slowed compared to previous years.

Air Quality (7 / 10): Steady progress has been made in air quality commitments through the lifetime of the Government in spite of some challenging political conditions. Significant commitments in this area have been achieved, including a nationwide smokey fuels ban; development of a clean air strategy; and a national air quality monitoring network. However, maintenance of the monitoring network and enforcement of the smoky fuels ban are inadequate, and commitments related to regional air quality, noise, and high sulphur fuels have been neglected. Thus, the score for this category remains the same as the past two years.

Transport (6.5 / 10): There is good progress in some areas of transport with many schemes and significant investment in more sustainable modes, though still not at the 2:1 ratio committed by the Government. However, there is a difference between throwing money at a problem and spending it, and the underspend of local authorities in this area has been a roadblock to success. Good progress has been made in commitments on e-scooter legislation, lowering speed limits, facilitating taxi drivers to move to electric vehicles, electrification of some new trains, developments in a national rail strategy, and noticeable improvements in local link bus services and regional connectivity. Commitments on ride-sharing, extending bike-to-work schemes, school transport and Western rail corridor do not appear to be progressing, and Metrolink and Bus Corridor projects have been plagued with planning issues. In our 2021 assessment, it seemed the transport sector was *“the only one that could meet its sectoral emissions ceiling target”*. However, in 2022, emissions in this sector went up 6% and there is no clear sign that the emissions curve will bend in 2023-2024, which has led to a small decrease in this category’s score compared to last year.

Buildings (7 / 10): Commitments related to the built environment have moved from “moderate” progress to “good” progress this year with higher uptake of energy retrofit grants and creation of one-stop-shops. The Government has made a wide range of grants available. For example, grants to landlords to improve BERs is welcomed. In some areas, targets are progressing ahead of schedule. However, the ease of engagement for householders needs to be improved and progress is too slow in commitments regarding heat pump installation and district heating. The residential sector was the only sector with significant emissions reductions in 2022, though much of this was driven by external factors.

Energy (7 / 10): Much more progress on energy commitments was observed this year compared to last year, particularly with respect to the first off-shore wind auction garnering one of the lowest prices paid by an emerging offshore wind market worldwide and significant developments on interconnection and residential solar microgeneration. The ongoing roll-out of smart meters and EirGrid’s future plans for shaping the grid were welcome achievements. There was a reduction in the amount of coal, oil and peat used in the sector, but emissions are still too high and the pace of development of renewable energy projects and grid upgrades is too slow. Nonetheless, this sector has continued to make progress on achieving environmental commitments in spite of the energy crisis.

Agriculture & Forestry (4 / 10): The current agri-food strategy is still responsible for growing nutrient pollution and poor water quality and such trends now appear locked in for the remainder of this Government. However, there has been more progress in the Government’s agri-environmental commitments this year compared to previous years. The Government is flirting with failure in achieving their agri-environmental commitments. Positive progress in some commitments includes development of solar energy on farms, some peatland rewetting, tillage expansion, and organic farming supports. Emissions are down slightly due to fertilizer costs, though they could easily rebound as prices stabilize. Protected urea usage increased by 59% in 2022, and this should have a positive impact on emissions reductions. Some improvements have been made in forestry, but afforestation still remains well below target. Land use remains a significant carbon source when it should be a carbon sink.