

12th August 2026

National Women's Council Submission to the Public Consultation on the Next Update to the Climate Action Plan – Climate Priorities

Introduction

This submission to the public consultation on the next update to the Climate Action Plan has been prepared by the National Women's Council.

The National Women's Council is the leading national representative organisation for women and women's groups in Ireland, founded in 1973. We have almost 200 member groups and a large and growing community of individual supporters.

The ambition of the National Women's Council is an Ireland where every woman enjoys true equality and no woman is left behind. This ambition shapes and informs our work, and, with our living values, how we work.

We are a movement-building organisation rooted in our membership, working on the whole island of Ireland. We are also part of the international movement to protect and advance women's and girls' rights.

Our purpose is to lead action for the achievement of women's and girls' equality through mobilising, influencing, and building solidarity.

NWC's current Strategic Plan *Time to Act for Women's Rights and Equality* aims to grow feminist communities for climate justice and to embed feminist climate justice in climate policy and action across the island of Ireland, ensuring that gender equality is central to all climate solutions.

This submission has been informed by consultation with the Policy & Advocacy working group of the [Feminist Communities for Climate Justice National Network](#).

Q1: 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 end of industrial peat extraction in Ireland is a positive in creating carbon sinks, especially as Ireland remains an outlier in Europe for its land being a net source of carbon emissions. Faster and fairer work needs to continue in this area urgently to enable a Just Transition for rural Ireland and to prevent the continued extraction from and degradation of Ireland's peatlands - Ireland is being referred to the European Court of Justice by the European Commission for failing to stop illegal peat extraction.¹
- Investment in existing and new public transport infrastructure like LocalLink services and Safe Routes to School has been a great benefit towards enabling both emissions reductions and a culture change from car dominance. Public transport use in Ireland has hit record highs in recent years, with a record 363.5 million public transport journeys in 2025 - up 6% from 2024.² 526 primary and post-primary schools are active in the Safe Routes to School programme - completed schools saw a 16.7% decrease in car use and a 36.1% increase in pupils cycling.³ Only 65 schools have full works completed, so there are many more gains to be made in this area.⁴ It is crucial that the previous 2:1 spending ratio on public to private transport is readopted in order to make further progress in this area. Robust public/active transport links to schools will also help reduce the number of companion journeys related to school drop offs – women carry out nearly twice as many of these journeys compared to men in Ireland.⁵
- Whilst the EPA now projects for the first time that we are close to meeting our first carbon budget, it is important to note that Climate Action Plan 2026 (hereafter referred to as CAP26; and previous CAPs) is just one of many obligations under the legally binding Climate Action and Low Carbon Development (Amendment) Act 2021. It is crucial to recognise decisions being made *now*, including the undermining of the Act itself, will have implications for Ireland continuing to meet our current and future carbon budgets. The Act has faced challenges to its effectiveness recently, particularly the disapplication of Section 15 of the Climate Act for designated critical infrastructure projects under the Critical Infrastructure Act.⁶

¹ O'Doherty (2026) [EU is taking Ireland to court over failure to stop illegal peat extraction – The Irish Times](#)

² [Passenger Journeys up 6% across the TFI Network in 2025 - National Transport](#)

³ Heffron et al (2025) [Active Travel: The Magic Pill Summary Report](#) - Climate & Health Alliance Ireland

⁴ [Safe Routes to School | Promoting Safe Travel to Schools](#)

⁵ CSO (2026) [Why We Travelled: Travel Behaviour Trends 2024 - Central Statistics Office](#)

⁶ [Critical Infrastructure Act 2026 – No. 16 of 2026 – Houses of the Oireachtas](#)

Q2: 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?

- The transition of our energy system is the anchor for further decarbonisation, particularly in our transport, industry and residential sectors. Building Ireland's grid capacity to enable the on-boarding of renewable energy - and to prioritise this on-boarding over the needs of Large Energy Users like data centres - should be one of if not the highest priority action from Government. Massively expanding generation from wind and the completion of new interconnectors with France and the UK are complementary actions to this capacity building and should also be prioritised.
- Mainstreaming the Just Transition Framework across climate policy-making; ensuring the cost of climate action is shared equitably across society; and just transition being embedded into climate action dialogue and engagement. Drawing down from the Social Climate Fund is also a key just transition action referenced in CAP25.
CAP26 should expedite the establishment of Just Transition Indicators to support the monitoring and evaluation of progress towards a just transition in Ireland that identifies and supports those most at risk from the effects of climate policies and from the broader impacts of climate change, and those least able to take climate action. These indicators should be co-produced with groups disproportionately impacted by climate change and climate policies, such as women, Travellers, disabled people, younger people, older people and lone parent households.
- CAP25, in its Investment chapter, references the €663 million that can be drawn down from the EU Social Climate Fund to support vulnerable groups in the transition - despite this opportunity, Ireland has yet to complete the consultation process and draft of its Social Climate Plan for submission. Ireland must publish and submit its Social Climate Plan to the European Commission without further delay so that funding to address energy and transport poverty can be drawn down from the Social Climate Fund.
- Massively scale up home retrofits and heat pump installations - improve energy efficiency, and replace fossil-fuel heating systems in residential and commercial buildings that are currently off track for 2030 targets. 5000 social homes need to be retrofitted a year to meet 2030 targets, according to the Climate Change Advisory Council⁷.
- Speed up transport decarbonisation through an increase in electric vehicle uptake, charging infrastructure, public transport use, and active travel to reduce emissions from one of Ireland's largest emitting sectors.
- Agriculture remains Ireland's largest source of emissions. CAP26 should pursue identified actions to reduce agricultural emissions: prioritise measures such as protected urea, improved nitrogen management, methane reduction technologies and more efficient

⁷ Costa (2026) [Local authorities need to retrofit 5,000 social homes a year to meet climate targets, watchdog says](#)

farming practices.

- Ireland's LULUCF⁸ sector is a net source of emissions, when it should be a carbon sink. CAP26 should highlight the importance of expanding forestry and peatland restoration by increasing carbon sequestration through afforestation, peatland rehabilitation and improved land-use practices to strengthen Ireland's natural carbon sinks.
- Ensure all Local Authorities meet the requirement (contained in CAP19) to plan and codesign a Decarbonising Zone in their areas. These Zones aim to develop a coordinated area and community-based response to reducing emissions across all areas of responsibility of Local Authorities. It is essential that the preparation and finalisation of the Decarbonising Zone plans are developed within a Just Transition framework to ensure the most marginalised are included and share in the benefits.

Q3: 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?

- (Electricity) CAP26 must incorporate the emissions and energy usage of data centres into its forecast of actions that will ensure that Ireland meets its emissions reductions targets by 2030 and must be willing to recommend against the continued connection of data centres if they are incompatible with meeting these targets.
- (Transport) Ireland is rich in policies and plans to promote sustainable mobility and active travel - however, implementation to date has been slow and fragmented, and the decision to discontinue the 2:1 spending ratio on public to private transport infrastructure will hinder further progress in this area. This spending ratio must be readopted and strengthened, potentially through making the ratio legally binding for future Governments.
- (Transport) Residents of Ireland's inhabited offshore islands rely on diesel powered ferries, planes, and cargo boats to get on and off the islands and for delivery of necessities such as shopping and medication. CAP26 should create a suite of actions to tackle these barriers to a low-carbon transition, such as piloting (and eventually rolling out at required scale) transportation modes for the offshore islands with a reduced carbon footprint or - where possible - zero emissions modes. Battery powered ferries, for example, can be utilised for shorter trips and are already in use in Norway and Sweden.
- (Agriculture) The diversification of Ireland's farmers and farming activities is essential to the sector's decarbonisation efforts and longevity - the average Irish farmer is approaching 60 years of age and only 4% of farmers are under the age of 35⁹ - but barriers exist for women

⁸ LULUCF - Land Use, Land Use Change & Forestry sector

⁹ Perez-Armenteros, O'Connor & Curtin (2026) [Who will Grow Ireland's Food? Rethinking Policy for a New Generation of Horticulture Entrepreneurs](#) - Public Policy

and other marginalised groups in starting up in the sector as well for those already in the sector who wish to remain in it. The removal of payment/credit first barriers for marginalised women farmers - single women, lone parents, widows, and disabled women - to agricultural schemes such as Targeted Agriculture Modernisation Schemes (TAMS) and LEADER would better enable their participation. Additionally, a feasibility study should be commissioned to expand the Rural Social Scheme (RSS) to provide practical support for vulnerable farmers who cannot access or afford existing farm relief services.

- (Agriculture) The high level of food produced for export is both an environmental sustainability and food security issue, as is the high import level of fruit and vegetables. This imbalance continues to shape policy priorities and investment decisions and leaves horticulture at the margins - grassland and livestock systems account for 94% of land use while the horticulture sector continues to shrink, now only taking up 2% of Irish farmland. Despite this, horticulture is the part of agriculture most directly linked to domestic food consumption and the sector generates around €520 million annually and supports over 6,000 jobs.¹⁰ CAP26 needs to work towards a greater balance being struck in levels of investments and support for horticulture to ensure environmental sustainability and food security.

Q4: 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?

- CAP26 must clearly communicate how the measures it proposes will lead to reductions in carbon emissions. CAP23 was the subject of a(n ultimately rejected) legal case, which raised that CAP23 and its Annex of Actions failed to show with a sufficient level of specificity how Ireland will reduce greenhouse gas emissions in line with legally binding carbon budgets.¹¹
- Building on the positive work done by phasing out the burning of coal, Ireland should set a phase-out date for oil and gas. Along with its support for the [2027 Transition Away from Fossil Fuels conference](#) - which Ireland will co-host with Tuvalu - Ireland should advocate for and commit to a legally binding global phase out of fossil fuels, like a Fossil Fuel Treaty. Preexisting actions in previous CAPs will make this ambition feasible, including continued investment in the national grid, offshore wind energy, and energy storage for energy sovereignty and to move away from fossil fuel dependence. Overreliance on imported oil and gas has left Irish households, food producers and businesses exposed to volatile energy price shocks and is not a sustainable solution for Ireland's energy security - in the same vein, Ireland should not bring shale/fracked gas imports through the Shannon Floating Storage Regasification Unit (FSRU), which would create further dependency on imported fossil fuels and would be just as vulnerable to geopolitical shocks as existing imported fuels. The processes of extracting, liquefying and transporting shale/fracked gas are energy-intensive

¹⁰ *ibid*

¹¹ [Challenge to the Irish Government's Climate Action Plan 2023 rejected - Community Law & Mediation](#)

and leak huge amounts of methane, making shale/fracked gas worse than coal in its negative impact for climate change.¹²

- Despite the island of Ireland being a distinct environmental unit, as well as a number of existing and future transboundary climate impacts for both jurisdictions on the island of Ireland, previous CAPs have very little content on how such impacts will be tackled nor their impact on meeting Ireland's emissions reductions targets. The pollution of Lough Neagh by blue-green algae blooms¹³ and proposed gold mining activities in the Sperrin Mountains¹⁴ carry negative environmental health and physical health impacts for both jurisdictions. Although the Good Friday Agreement establishes the environment as one of twelve core areas for North-South cooperation, both jurisdictions have developed almost completely segregated environmental governance structures, legal and policy frameworks, and implementation processes.¹⁵ CAP26 should highlight a need for improved and ongoing cross-jurisdictional cooperation on climate action, ensuring that there is a shared all-island approach to tackling the climate crisis.¹⁶
- Ireland remains highly reliant on carbon dioxide removal (CDR) to meet its carbon budgets¹⁷ – despite the fact that EU targets state that emissions reductions should be prioritised over CDR. CAP26 must be explicit in mapping out a path to meeting our targets *without* overly relying on CDR.
- Ireland's climate action and legislation needs to align with the EU, which can leave the public wondering why new or existing climate policies serve certain functions. CAP26 should clearly show where alignment with the EU exists and steps to be taken to ensure that misalignment is rectified.
Building on this, CAP26 should align with the priorities of Ireland's EU Presidency term.
- CAP26 should highlight/focus on the positive health impacts that climate action can reap, as well as the reduced costs for the Irish healthcare system. When climate action is framed within the context of health, it resonates more effectively with the public¹⁸.

¹² Howarth (2024) [The greenhouse gas footprint of liquefied natural gas \(LNG\) exported from the United States](#). DOI: 10.1002/ese3.1934

¹³ DAERA and the Department of Infrastructure's [Lough Neagh Report](#) (2024) details the transboundary catchment area of the Lough on pg. 11; see also [Water Quality – Tuesday, 10 Feb 2026 – Parliamentary Questions \(34th Dáil\) – Houses of the Oireachtas](#)

¹⁴ Strecker et al (2025) [Transboundary Environmental Justice: Gold Mining in the Sperrin Mountains](#)

¹⁵ Brennan et al (2023) [Linking the Irish Environment: Final Report](#)

¹⁶ See Table 1 (pg 27) of O'Neill and Brennan (2025) [Lough Neagh: A Case Study in Environmental Justice](#) and Brennan et al (2023) [Linking the Irish Environment: Executive Summary & Recommendations](#), pgs 6-23

¹⁷ Hirschberg (2026) [Leaning on uncertainty: How Europe's flawed approach to carbon removals threatens the climate - Carbon Market Watch](#)

¹⁸ Martins et al (2024) [The Double Burden: Climate Change Challenges for Health Systems](#). DOI: 10.1177/11786302241298789

- CAP26 should bring forward the introduction of the WHO guidelines on air quality, which are stricter than the current EU guidelines but would have a significantly positive impact on respiratory health in Ireland¹⁹ and reduce the costs for our healthcare system - which were costed at an upper estimate of €105.8 million over a four-year period²⁰.
- There are myriad positive health benefits to be gained in realising public and active transport goals. Existing transport infrastructure locks in car dependency for many, deterring the use of active travel modes like walking and cycling. Embedding active travel into daily lives through the delivery of enabling infrastructure would create a range of health and environmental benefits for all, and help save Ireland's healthcare system €1.13 billion a year in healthcare costs related to physical inactivity.²¹ Public transport commutes have been estimated to have an average of 2,400 steps daily, and new public transport options can boost light to moderate activity by 30 minutes weekly.²²
- The preservation of nature and biodiversity can contribute to better mental health and overall wellbeing by providing more accessible green spaces.
- Supports for sustainable and healthy food production and promotion of sustainable diets can reduce healthcare costs associated with cardiovascular diseases.

Q5: 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?

- Stakeholders that the Oireachtas Committee consulted with for this report in the area of Electricity noted that Large Energy Users, particularly the growth of data centres, as barriers to achieving climate goals in the area of energy. Despite this, there are continuing data centre connections in Ireland whilst grid infrastructure capacity is limited. Further data centre connections must be paused until grid infrastructure can accommodate the level of renewable generation and electrification needed to reach legally binding targets as a priority action.
- Stakeholders that the Oireachtas Committee consulted with for this report in the area of Transport identified limited incentives to expand the use of EVs, and no targeting of low-income and rural households and the additional supports they require, as a barrier to achieving climate targets alongside the slow progress of the electrification of public

¹⁹ EPA (2023) [Ireland's ambition to move towards the health-based WHO air quality guidelines will be challenging, but will have a significantly positive impact on health](#) | Environmental Protection Agency

²⁰ See Table 3 (pg 22) of Nolan (2023) [The healthcare costs of poor air quality in Ireland: An analysis of hospital admissions](#) - ESRI

²¹ Bowers (2025) [Physical inactivity costing €1.1bn a year in healthcare](#) - RTE

²² Heffron et al (2025) [Active Travel: The Magic Pill Summary Report](#) - Climate & Health Alliance Ireland

transport more generally. The recent pilot scrappage scheme for older fossil fuel cars to transition to EVs, including its prioritisation of rural areas, should be extended. Targeted supports/subsidies for lower-income households, and higher subsidies for rural households, should be explored to better enable the adoption of EVs – including second hand cars – for a broader range of households.²³

As identified above, limited grid capacity and the capture of that capacity by Large Energy Users like data centres impedes progress in electrifying Ireland's transport network, pitting the interests of private tech companies over enabling the public to fully participate in meeting and better enabling Ireland to meet its emissions reductions targets.

- A barrier to meeting energy reduction targets is the slow pace of retrofitting for residential, public and private rented properties. The barriers to access of full retrofitting need to be addressed, which impact mainly on disadvantaged groups:
 - Raise income thresholds to access the Warmer Homes Scheme, which act as a barrier to many older people's access to the scheme. Age Action estimates 60% of homes with BER ratings of E, F and G are occupied by older people.
 - Private tenants continue to be excluded from the retrofitting process and grants – lone parent households headed by women in the private rental sector are disproportionately impacted by poor-quality housing. The long identified split incentive for landlords to retrofit rental properties should be a priority action to address alongside incentives linked to protection for tenants' tenancies.
 - Expedited rollout of social housing retrofitting
 - Ensuring access of full supports for retrofitting for social housing bodies
 - Creating a rent-to-buy scheme of more energy efficient mobile homes for members of the Traveller community, who are disproportionately exposed to energy poverty and remain excluded from existing energy efficiency upgrade schemes.
- A lack of an all-of-Government approach to climate action is a barrier to effective climate action, especially where some policies outright contradict each other and/or climate targets. There is a knowledge gap – for staff within Government departments as well as the general public – which needs to be addressed through a National Education Programme on climate change and Ireland's carbon budgets.
- Some Government climate policies are weaker in rural areas as a blanket approach does not suit the rural context – continued solid fuel use, peat extraction from bogs, one-off housing and agriculture need different approaches, particularly where gaps in greener infrastructure like access to public transport and retrofitting persist.

²³ Stefaniec et al (2025) [The challenge of making EVs just affordable enough: Assessing the impact of subsidies on equity and emission reduction in Ireland](https://doi.org/10.1016/j.retrec.2024.101495). DOI: 10.1016/j.retrec.2024.101495

- Sustainable Energy Communities (SECs) continue to face barriers in funding to carry out vital work in engaging and enabling communities to take part in the energy transition. Government should work directly with SECs to identify their needs, enable them to become more autonomous, and carry out their work.
- The European Training Foundation found that across EU countries, skills development, workforce planning, lifelong learning, and labour market adaptation remain fragmented and often poorly integrated into climate strategies. Building the capacity of the Irish workforce to enable a just and green transition – especially addressing the lack of labour in retrofitting – will be key to meeting our emissions reductions targets. It will also be important to encourage a high participation of women in these sectors, as they are typically underrepresented in construction, engineering and energy.

Q6: 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?

- Women and girls are disproportionately disadvantaged by climate change and environmental degradation. Despite this, references to the impacts of climate change for women and girls in CAPs have largely been contained in chapters dedicated to overseas aid, neglecting the fact that there are gendered impacts for women and girls in Ireland, too, including heightened exposure to energy poverty. A lack of gender disaggregated data means that there is no evidence-base to inform climate policies or enable gender mainstreaming. Research conducted by the Parliamentary Budget Office on Gender Budgeting in Ireland found that the (then) Department of Environment, Climate and Communications used no gender equality metrics in its work.²⁴

CAP26 and Ireland's climate policies going forward must include gender meaningfully; use gender equality metrics; and be informed by gender disaggregated data alongside targeted stakeholder engagement with women in all of their diversity - Traveller women, migrant women, older women, disabled women, young women and women in rural/Gaeltacht areas. CAP26 and climate policies going forward must also address the gender-gap in green jobs, which are concentrated in engineering, construction and energy - all male-dominated fields - and identify existing low-carbon jobs such as those in care work, community work and education as green jobs for meaningful inclusion in Just Transition strategies regarding employment.

- Meeting carbon budgets alone can only ensure a green transition, not a Just Transition. Achieving the latter requires consistent application of Article 2 of the Paris Agreement - also

²⁴ Parliamentary Budget Office (2025) [Gender Budgeting in Ireland](#)

known as the Paris Test Assessment²⁵ - by the Climate Change Advisory Council (CCAC) on each of Ireland's carbon budgets.

- Ireland maintaining meaningful compliance of the Aarhus Convention²⁶ is key to a Just Transition, particularly the principle of social dialogue and lived experience - however, a number of barriers exist which heavily limit access to environmental information, decision-making and justice in Ireland. New regulations which cap the legal costs that applicants who win their judicial reviews relating to the environment can recover creates another financial barrier to accessing legal justice - this means that even those who win a case could still face huge fees to correct an unlawful decision made by a public body, therefore penalising the public for holding the State and its bodies accountable for adhering to its own environmental law.²⁷

Ireland already has some of the most expensive legal fees in the EU. The Aarhus Convention requires that environmental review procedures must be fair, equitable, timely, and not prohibitively expensive.²⁸

The consultation on the aforementioned change to capped legal costs was criticised by²⁹ multiple³⁰ organisations³¹ on its framing, timing and the late release of important and relevant information to the consultation - this itself compromises compliance with the Aarhus Convention's provision of participation in decision-making.

- Recent discourse and reviews on the National Dialogue on Climate Action at the 2025 National Economic Dialogue (NED) and by the Just Transition Commission has found that it is insufficient to enable continuous, frequent and meaningful engagement. A 'Climate NED' was proposed by both Minister O'Brien and the Just Transition Commission. Government should proceed with the Commission's proposal.³²

²⁵ "Meeting Article 2 of the Paris Agreement by pursuing efforts to limit global average temperature increase to 1.5 °C above pre-industrial levels, *"implemented to reflect equity and the principle of common but differentiated responsibilities and respective capabilities."* Therefore, the CCAC is required to show how its recommended carbon budgets for the principal GHGs are aligned with achieving a 'fair-share' national 1.5 °C goal." See Price (2026) [Consistent Paris Test assessment of the 2024 Proposal for Ireland's 2031–2040 Carbon Budgets](#).

²⁶ The Aarhus Convention is an United Nations Economic Commission treaty that sets out rules to promote public participation in environmental matters. The European Union and its member states are parties to it, and the convention became law in Ireland in 2012. It holds public authorities accountable for providing citizens with access to information; access to public participation; and access to justice in environmental matters.

²⁷ [The end of environmental public interest litigation? | An Taisce - The National Trust For Ireland](#)

²⁸ "In its submission to the Department, the Law Society set out that the scale of costs is contrary to Article 9 of the Aarhus Convention, which requires that review procedures be fair, equitable, timely and not prohibitively expensive." Hunt (2026) [Means over merit: Scale of costs in environmental Judicial Reviews](#)

²⁹ [Submission by Environmental Justice Network Ireland \(EJNI\) to the Public Consultation on the regulation of costs payable under the Planning and Development Act 2024 \(Scale of Fees\)](#)

³⁰ Griffin (2026) [Capping legal costs in environmental cases 'unlawful' - An Taisce - Agriland.ie](#)

³¹ [Submission by the Bar of Ireland: Regulation of Costs Payable in Matters Prescribed on Foot of Section 294 of the Planning and Development Act 2024](#)

³² Just Transition Commission (2026) [Proposal for a National Climate Dialogue](#)

- The funding of the transition is critically important to plan. Funding sources at EU and national levels need to be identified and should detail on how they align with Just Transition principles - the EU Social Climate Fund, for example, is explicit in its targeting of those exposed to energy and transport poverty. Ireland has done valuable work in the past keeping Just Transition on the agenda, including at COP28 by leading negotiations on Loss and Damage funding. Ireland can continue this work during its Presidency of the Council of the EU by steering negotiations to ensure Just Transition remains a priority at EU level in the new Multiannual Financial Framework.³³
- Ireland must publish and submit its Social Climate Plan to the European Commission so that funding to address energy and transport poverty can be drawn down from the Social Climate Fund.
- The Traveller community must be meaningfully included in Ireland's green transition. Travellers have received little to no attention in CAPs; are not identified as a high-risk group for energy poverty in the National Energy Affordability Taskforce's Interim Report despite being disproportionately impacted by it; and no existing retrofitting plan is inclusive of Travellers living in mobile homes/trailers. CAP26 and future CAPs must include a suite of actions tailored to the Traveller community - which should be co-designed with Travellers themselves - to enable the meaningful inclusion and participation of Travellers, including Traveller women, in the green transition.

Q7: 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?

- The National Adaptation Framework defines Maladaptation as "*actions that may lead to increased risk of adverse climate-related outcomes, including via increased greenhouse gas (GHG) emissions, increased or shifted vulnerability to climate change, more inequitable outcomes, or diminished welfare, now or in the future.*". Actions which result in increased GHG now will intensify future climate impacts - these actions should be properly identified as maladaptation and avoided to the very best ability of the Government. This definition of maladaptation should be used when assessing the impact of connecting further Large Energy Users to the grid and introducing the Shannon FRSU.
- Mainstream adaptation across all sectors to ensure that agriculture, transport, energy, water, health and local government actions are assessed for climate resilience as well as emissions reduction.
- The State should prioritise adaptation measures for electricity networks, water systems, waste water systems, transport infrastructure and telecommunications, including network coverage and completing the National Broadband Plan. Such actions will help support

³³ See Devitt, Brennan and McIlhennon (2026) [Steering the EU's Multiannual Financial Framework towards Climate Action and Just Transition: the Role of the Irish Presidency of the Council of the EU](#)

communities in responding to and withstanding more frequent floods, storms and extreme weather events.

- The Office of Emergency Planning should build the capacity of local authorities and communities particularly impacted by flooding, coastal erosion, heat stress and other climate impacts through dedicated training, funding and planning measures, including the development of a dedicated National and Local Extreme Weather Events Strategy to ensure that the most vulnerable are protected.
- Resourcing of the Flood Relief Scheme of both funding and staffing should be increased in order to progress flood protection at an expedited rate for impacted villages, towns and cities.
- Nature can provide both mitigation and adaptation benefits for the community and society as a whole. Increasing nature-based solutions to expand peatland restoration, afforestation, wetland protection, habitat protection and urban planning for green spaces are important adaptation actions:
 - Restored wetlands and floodplains can absorb excess rainwater, reducing the severity of flooding for communities.
 - Reversing the decline in Irish saltmarshes³⁴ should be a key nature-based adaptation action in CAP26. Not only are saltmarshes highly efficient carbon sinks, they also protect coastlines from storm surges and can reduce the severity of flooding incidents³⁵.
 - Introducing more urban green spaces, including green roofs and green walls, will help reduce the temperature of urban areas during heatwaves. Urban areas experience higher temperatures during heatwaves due to the urban heat island effect, where materials like concrete, tarmac and brick absorb and hold the sun's heat. Trees and grass help to reduce temperatures by cooling the air.
- Maintain all existing national parks and expand the provision of national parks within the State.
- Set measurable adaptation targets that benefit the common good and protect the land and natural resources for future generations. Adaptation targets and actions should incorporate the principles of Just Transition.
- CAP26 should include clear adaptation Key Performance Indicators for all stakeholders that are impacted with timelines. There should be reporting requirements put in place to a

³⁴ Dodd (2026) [Decline in number and quality of saltmarshes in Ireland](#) - RTÉ

³⁵ Cott (2024) [Saltmarshes - Much More Than Meets the Eye - Earth Comment](#)

competent relevant authority in order to ensure the meeting of emission targets providing for improved accountability.