

Public consultation on the next update to the Climate Action Plan – Climate Priorities

Submission by the Maritime Area Regulatory Authority (MARA) in response to consultation

Introduction

The Department of Climate, Energy, and the Environment held a public consultation to inform the next update to Ireland's Climate Action Plan. The consultation sought views on the key priorities and actions that should be reflected in the next plan, with a particular focus on identifying practical and high-impact measures that can support progress towards Ireland's national climate and energy objectives.

The Climate Action Plan provides the framework through which Ireland sets out the measures required across government and across sectors of the economy to reduce greenhouse gas emissions, support the transition to a climate-neutral and climate-resilient economy, and meet national and European climate commitments. The continued development of renewable energy and the infrastructure required to support it will form an important part of this transition.

MARA provided a response to the consultation focusing on matters relevant to its statutory functions and to the sustainable development and regulation of Ireland's maritime area. MARA's response considered the role of the maritime regulatory framework in facilitating the delivery of offshore renewable energy and associated infrastructure, while maintaining appropriate environmental and regulatory oversight.

MARA's response to the consultation is available below.

Question 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?

MARA considers that the improvement in Ireland's emissions trajectory reflects the cumulative effect of sustained national climate policy, targets, monitoring and implementation across successive policy cycles. From MARA's perspective, the following measures and policy instruments have been particularly important in providing the framework within which emissions reductions have been pursued:

- The Long-term Strategy on Greenhouse Gas Emissions Reductions.
- Successive Climate Action Plans.
- Ireland's GHG Emissions Inventory.
- The Programme for Government 2020.

Taken together, these measures have provided strategic direction, recurring implementation commitments and an evidence base against which progress can be assessed. Continued consistency between long- term policy, annual or periodic delivery plans and emissions monitoring will remain important as Ireland moves into the next Carbon Budget period.

Question 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?

MARA considers a high priority to be supporting a State-led marine management regime, including the delivery of Guidelines on Designated Maritime Area Plans (DMAPs).

A clear, plan-led approach to the use of the maritime area is important to the sustainable development of offshore renewable energy and associated infrastructure. Timely delivery of

the DMAP Guidelines would support greater consistency in the preparation and implementation of future DMAPs, provide clearer expectations for relevant State bodies and stakeholders, and help ensure that marine spatial planning considerations are incorporated at an early stage in infrastructure development.

This should be supported by effective coordination between the bodies involved in maritime authorisation, planning, environmental assessment, grid development, ports and other enabling infrastructure. Greater clarity and sequencing across these processes can support delivery while maintaining the integrity of the relevant statutory processes.

Question 3

In the key sectoral areas identified (Electricity, Transport, Industry, Buildings, Agriculture and Land Use), what additional actions to those already in Climate Action Plan 2024 and Climate Action Plan 2025 could, in your view, accelerate delivery in these areas?

From MARA's perspective, two additional actions would be particularly relevant to accelerating delivery in the electricity and transport sectors.

- Publish Guidelines on Designated Maritime Area Plans. Clear guidance would support a consistent, plan-led approach to future DMAPs and provide greater certainty on how marine spatial planning policy is to be applied as offshore renewable energy development progresses.
- Complete the review of the National Ports Policy to establish a policy framework that contributes to the decarbonisation of maritime transport and the wider logistics chain, while also supporting the development of Offshore Renewable Energy (ORE). Ports will be a critical part of the enabling infrastructure required for ORE deployment, including construction, operations, maintenance and associated supply chains.

These actions should be considered in a coordinated manner. Marine planning, port capacity, grid infrastructure, supply chains and other enabling infrastructure are closely interconnected, and progress in one area may depend on timely decisions and investment in another. A clearer policy framework would assist the relevant bodies in sequencing delivery and planning resources.

Question 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?

MARA considers that the spatial implications of supporting offshore wind should receive greater attention in the updated Climate Action Plan. Future investment in ports and other infrastructure supporting offshore renewable energy should be planned strategically, taking account of marine spatial planning policy, future Designated Maritime Area Plans, navigation requirements and cumulative interactions with other marine users.

The updated Climate Action Plan should also include clear policy commitments to improve consistency between regional terrestrial planning and marine planning frameworks. Offshore renewable energy delivery depends on infrastructure and activities on both sides of the land-sea interface. Port development, grid connections, supply chains, fabrication facilities, transport links and workforce requirements therefore need to be considered as part of a connected regional system rather than as isolated projects.

A coordinated regional approach to infrastructure sequencing and investment planning would help ensure that the necessary supporting infrastructure is available when required for offshore renewable energy deployment. Greater visibility of project pipelines and dependencies would also assist public bodies, infrastructure providers and regional authorities in planning resources and investment.

Question 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?

Yes. MARA largely agrees with the barriers identified in the Report. In addition, MARA considers that a lack of coherence between terrestrial and marine planning policy can act as a barrier to the development of port and associated infrastructure required to support offshore renewable energy.

Climate Action Plan 2026 should address Coastal Change Management, and port planning should explicitly consider coastal change, sea-level rise, coastal processes and long-term

climate resilience in accordance with national marine planning policy. These issues are particularly relevant where significant long-lived infrastructure is being planned in coastal locations.

MARA also wishes to reiterate the importance of Barrier 4: uncertainty in planning and consenting due to a lack of mandatory decision timeframes and inadequate resourcing of planning and consenting authorities, including inadequate resourcing of relevant environmental expertise. Access to the necessary specialist expertise is essential to achieving Ireland's climate targets.

Addressing these barriers will require clearer alignment between terrestrial and marine planning, adequate specialist capacity across the relevant public bodies, improved visibility of infrastructure dependencies and appropriate coordination between competent authorities. Efforts to accelerate delivery should provide greater certainty and efficiency while maintaining robust statutory decision-making and environmental assessment processes.

Question 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 Climate Action Plan or climate action more generally?

MARA has no additional comments on this question.

Question 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 Climate Action Plan?

The current update to the Climate Action Plan comes at a critical juncture in national climate policy as Ireland transitions into the second Carbon Budget period (2026-2030).

Consequently, an increased level of delivery is required, and MARA considers that the immediate focus should be on implementing the highest-impact existing measures in each key sector.

The National Adaptation Framework and Sectoral Adaptation Plans already provide the principal policy structures for adaptation. In this context, adding further climate change adaptation measures to the Climate Action Plan at this late stage could dilute the overall focus on delivery.

Priority should therefore be given to effective implementation of existing commitments and to ensuring that adaptation considerations already identified in the relevant national and sectoral frameworks are appropriately reflected in project and infrastructure planning.