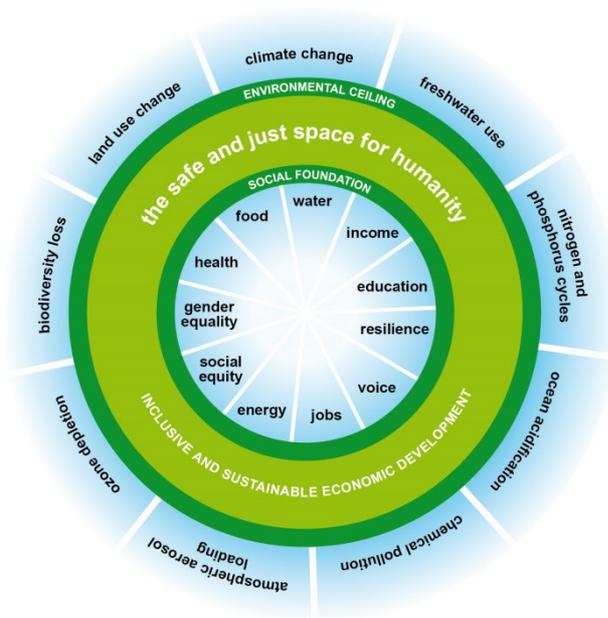


# Environmental Pillar Consolidated Policy Document



## August 2015

## Contents

	Introduction	3
1.0	Cross-sectoral Policies	5
1.1	Enforcement of Environmental Law	5
1.2	Environmental Governance	8
1.3	Taxation	11
1.4	Subsidies	11
1.5	Monetary Policy	12
1.6	Reform of the Euro	12
1.7	Employment	13
1.8	Training	14
1.9	Procurement	15
1.10	Investment programmes	16
1.11	Sustainability in the Private Sector	17
1.12	Planning	17
1.13	Innovation	18
1.14	Cooperatives	18
1.15	Local and Community Development	19
1.16	Trade Agreements, TTIP, CETA and TISA	19
1.17	National Risk Assessment	20
2.0	<b>Sectoral Policies</b>	22
2.1	Energy	22
2.2	Climate Change	27
2.3	Nature Conservation	29
2.4	Water	30
2.5	Sustainable Agriculture	32
2.6	Tree Cover	36
2.7	Marine	40
2.8	Oceans	44
2.9	Waste as a Resource	46
2.10	Transport	49
2.11	Tourism	51
2.12	Flooding	52
2.13	Leader Companies	52

## Introduction

## The Document

This document is a compilation of the headlines of all Environmental Pillar Policies to date. Each policy is linked to its source document. This document is intended to be updated periodically

## The Policy Context

Human Society emerged from, and is entirely reliant for its survival on, the natural environment. Economic systems are created to serve society and can be changed by society. Human society on its present course, with a rapidly growing population, and with an economic system based on an ever increasing use and abuse of natural resources, is destined to destroy the natural systems on which it relies for its survival. <http://environmentalpillar.ie/environmental-pillar-consultation-response-to-the-draft-framework-for-sustainable-development-for-ireland/>

The continued emphasis on economic growth as a key to the success of society flies in the face of the reality that our species is living on a finite planet with finite resources, and a finite ecological carrying capacity. All policies must act to protect our ecological assets. These assets are at the core of our long-term wealth and well-being. The conventional “grow first, and clean up” path of development urgently needs to shift to a “green” path of development one which will result in a healthy, socially inclusive, productive, equitable, and more resilient society. The success of human society can no longer be based solely on financial metrics such as GDP or GNP, which measure financial activity regardless of whether it is good or bad for society. More prisoners, more ill-health, more waste etc. are all measured as positives within these yardsticks. The success of a sustainable economy must be counted differently.

Identifying and quantifying planetary boundaries that must not be transgressed could help prevent human activities from causing unacceptable environmental change, argued Johan Rockström and colleagues in 2009<sup>1</sup> (See overleaf). From a purely selfish anthropocentric point of view, a safe operating space for humanity cannot exist whilst we continue to kill off the other species of plants and animals that provide many of the services that humanity relies on for its well-being. However, the Environmental Pillar would add that the whole

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<sup>1</sup> <http://www.nature.com/news/specials/planetaryboundaries/index.html> [Accessed 20/02/2012]

diversity of life deserves a safe operating space too, and we as a species are reducing their space too

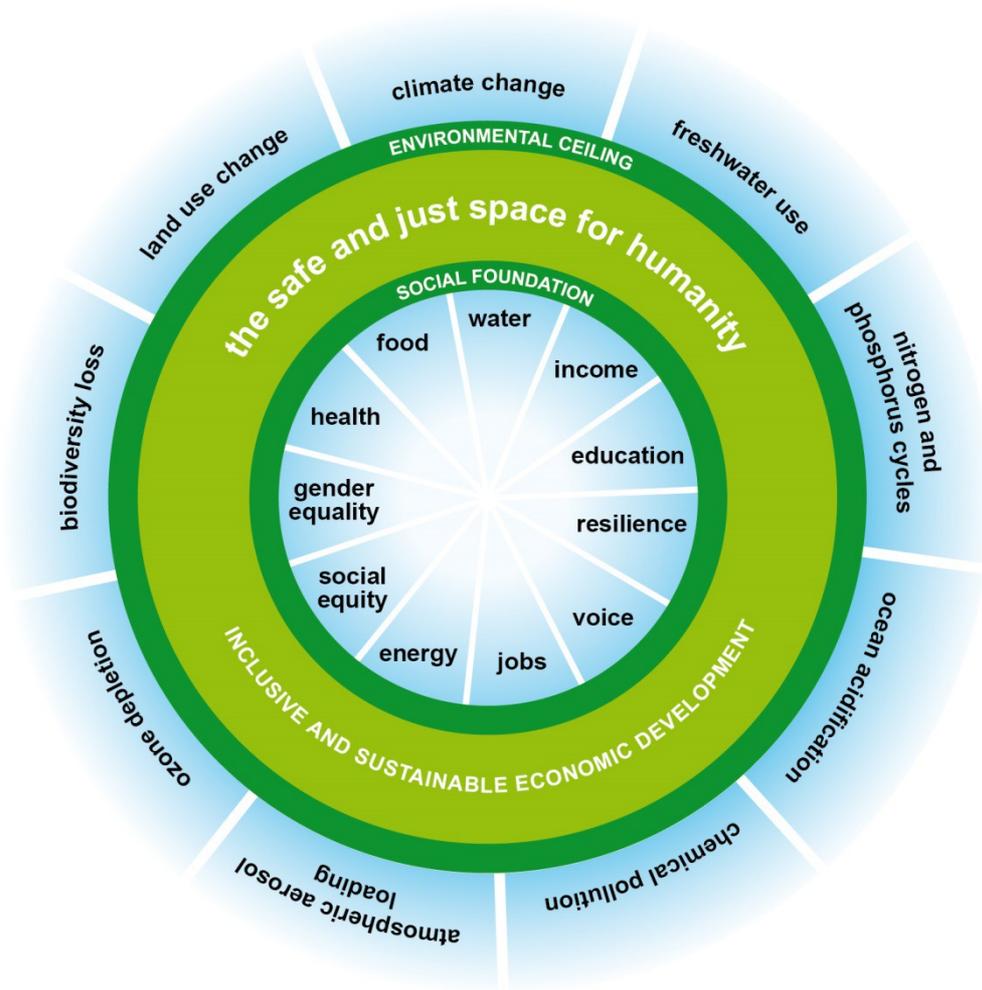


Fig. A safe operating space for humanity - Source Oxfam inspired by Rockström et al<sup>2</sup>

<sup>2</sup> <http://blogs.oxfam.org/en/blog/12-02-13-can-we-live-inside-doughnut-why-world-needs-planetary-and-social-boundaries> [Accessed 20/02/2012]

## 1.0 Cross-sectoral Policies

### 1.1 Enforcement of Environmental Law

- Proper enforcement of environmental law especially in fishing, quarrying, energy industries, agribusiness and others is essential. [Creating Sustainable Employment by Greening the Economy]
- Create ‘Wildlife Crime Officers’ managed through the EPA, NPWS and An Garda Síochána to reduce infringements of wildlife legislation, with state solicitors advised to secure fines that support environmental NGOs and the Wildlife Crime corp. [Creating Sustainable Employment by Greening the Economy]
- Ireland should follow up on the ratification of the Aarhus Convention, by ensuring full implementation of its provisions and those of existing EU Law which transpose parts of the Convention. Ireland should support the revival of the European Commission’s proposed directive on access to justice in environmental matters. Pending the adoption of a cross-cutting EU directive on access to justice, Ireland should amend its national laws and practices to ensure that accessing justice in environmental matters is no longer prohibitively expensive.
- Ireland should pursue every opportunity to promote Principle 10 of the Rio Declaration globally, including easing accession to the Aarhus Convention; supporting countries that are considering acceding to the Aarhus Convention and supporting the negotiation and adoption of a global Principle 10 convention or other regional or sub-regional Principle 10 conventions.

#### Access to Justice and Implementation of Article 9 of the Aarhus Convention

<http://environmentalpillar.ie/aarhus-convention-and-access-to-justice/> ]

- **Article 9.1**
- **Access to Information on the Environment (AIE) Appeal**

##### **Fees**

The standard and reduced fee should be abolished or at least brought into line with the government’s recent decision to reduce fees for FOI appeals to €50 (standard) and €30 (reduced).

- **Appeals to the Commissioner for Environmental Information**

Lengthy delays in processing appeals before the CEI are well documented. In our view the government should urgently provide adequate resources to the CEI. The

government should also specify in legislation a deadline for reaching decisions on AIE appeals.

– **Enforcing judicial reviews deadlines**

The practice of enforcing judicial reviews deadlines strictly against claimants but thereafter granting (public authority) respondents adjournment after adjournment to file their statement of opposition means that in most cases court action in Ireland will not provide a timely remedy, in breach of Article 9 (4) of the convention as applied to Article 9 (1) Aarhus.

– **Capacity Building in Public Authorities**

There is no systematic monitoring of public authorities' fulfilment of their access to information obligations under the Convention, including responding to information requests and internal review requests. Recent initiatives to address training for public authorities are most welcome. Such training should be regularly repeated and its effects monitored. The active dissemination obligations under Article 5 are key, we believe, to establishing a framework whereby public authorities fully understand their obligations.

– **Article 9.2**

– **The Review Process and Bodies**

**Planning and Environmental Tribunal**

The government should consider creating a body responsible for preliminary review across a comprehensive range of consent regimes and decisions, across a comprehensive range of decisions, acts or omissions subject to the provisions of Article 6 of the Aarhus Convention. Decisions of this Tribunal would then be judicially reviewable before the courts in the normal way, providing a two-tier system of review

– **No to an Environmental Court**

In our view, Judicial review should remain the jurisdiction of the High Court, it would not seem necessary to establish a dedicated Environmental Court to deal specifically with environmental judicial review.

– **Resourcing the Courts**

Ireland could make strides in terms of Aarhus compliance by adequately resourcing the courts and giving judges sufficient time to prepare in advance of each case.

– **Principle of Proportionality**

Ireland should pay heed to the findings of the Aarhus Compliance Committee and adopt the principle of proportionality as a ground for judicial review for cases within the scope of the Aarhus Convention.

– **Publication of Guidance on Review Procedures**

Legislation could usefully be drafted requiring all public authority decision makers to provide information publicly which meets certain basic criteria regarding: methods of

review, how these can be accessed and how rights to review can be exercised in practice. New legislation on this subject could provide a power enabling the publication of Ministerial guidance on such matters.

– **Freedom to choose Review Procedure**

In our view potential litigants should be free to choose the most suitable review procedure for any given decision. In other words, it should not be necessary to exhaust administrative review procedures before recourse to judicial review. This is particularly important given the significant expense often involved in appealing cases to An Bord Pleanála, which can serve to create a barrier to accessing Justice.

### **Article 9.3**

#### **Appeals regarding contravention of national laws on the Environment**

##### **Give the Courts freedom to decide if a Law relates to the Environment**

In our view the government should not attempt to define “national law relating to the environment” exhaustively in Irish legislation. This should be determined by the courts on a case by case basis.

##### **Early decision re whether a Law relates to the Environment or not.**

The combined approach of a non - exhaustive list with a back-up option of judicial determination of the issue (with the option of having the issue determined at the outset of proceedings ) would provide legal certainty for potential litigants, who would know at the earliest stage possible whether they will ( at least in principle ) be afforded protection under Article 9 (4) of the Aarhus Convention.

### **Article 9.4**

#### **Review processes shall provide adequate and effective remedies, including injunctive relief as appropriate, and be fair, equitable, timely and not prohibitively expensive.**

– **Third Party Enforcement**

In respect of third party enforcement: a generic third party enforcement power in respect of breaches of environmental legislation could be introduced into Irish law

– **Consolidation of Cost Rules**

The cost rules would benefit from consolidation into a single dedicated piece of legislation.

– **Equitable Cost Protection**

The right of a developer to pursue a review with cost protection should not be at the cost of or to the detriment of members of the public and NGOs being also able to participate in the review with similar cost protection as part of fair and equitable review.

- **Public Availability of Court Decisions**
- In the interests of transparency and consistency, it is vital that planning and environmental decisions taken in the Circuit Court are recorded in an accessible format that is publicly available online in a timely manner

#### **Article 9.5**

#### **Promoting Awareness and Removing Barriers to Access to Justice**

- **Promoting Awareness**

The government should put in place such appropriate assistance mechanisms and must promote environmental education and awareness about how to obtain access to justice.

- **Removing Barriers**

The government should consider the creation of a legal aid scheme for public interest environmental litigation within the scope of the Aarhus Convention.

## 1.2 Environmental Governance

- In the light of Rio+20, review the implementation of Agenda 21 in Ireland and put in place measures to fill the gaps. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- The creation of an ‘Ombudsman for the Future’. Sustainable decision-making requires an advocate for the generations to come and not just for the human species. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Clarify the role required of the EPA and revisit its legislative remit [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/> ]
- Configure and implement an essential complimentary programme of legislative reform. [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/> ]
- Integrate the relevant decision making frameworks of An Bord Pleanála & the EPA under An Bord Pleanála to allow environmental aspects of decisions to be dealt with as part of the planning process. [Environmental Pillar Submission to the EPA Review

Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/>]

- Provide a structure to conduct a substantive review of licensing and other significant decisions. [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/>]
- Provide for an Environmental List within the Court System and associated reform of penalty provisions for environmental crimes and damage. [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/> ]
- Widen the remit of the Enforcement Wing of the EPA and improve its function through the creation of an Environmental Crime Investigation Unit. [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/> ]
- Clarify and optimise the relative responsibilities of the NPWS and the EPA for biodiversity considerations. [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/> ]
- Specify additional licensing functions for the EPA. [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/>]
- Improved leverage of environmental monitoring & assessment information in assessing and feeding into National Strategies and Plans in order to:
  - Improve engagement of and by the public in the stewardship of the environment
  - Create a real appreciation of the alignment of interests between human health and environmental factors and thereby influence behaviour and choices to create positive environmental outcomes. [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/>]
- Generate greater leverage of the public at large in compliance and monitoring and response to environmental matters. [Environmental Pillar Submission to the EPA Review Panel <http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/>]
- Maintain the Review Panel as a steering group for the implementation of the Review Panel’s approved recommendations. [Environmental Pillar Submission to the EPA

Review Panel [<http://environmentalpillar.ie/environmental-pillar-submission-to-the-epa-review-panel/> ]

- Include the Right to a Clean and Healthy Environment in the Terms of Reference for the Constitutional Convention. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

### **EPA Draft Compliance and Enforcement Policy**

<http://environmentalpillar.ie/environmental-pillar-respond-to-draft-epa-regulation-compliance-and-enforcement-documents/>

- *Adherence to policies:* while the production of such policy documents must be welcomed, we reject the disclaimer/caveat providing the EPA with the flexibility to disregard the policies.

*Regulation:* More inspections must take place and inspections must take place in a timely manner. Un-notified spot inspections is, we submit, an effective way of supporting compliance behaviour, and a more effective inspection regime in terms of detecting problems. The EPA should also give advice and guidance at the planning permission stage.

- *Principles:* We welcome the fact that the 6 principles of the EPA’s approach reflect the need for Proportionality based on health and environmental risks, the additional principles of consistency , necessity, transparency and accountability, risk - based and polluter pays are all important. The principle of “Necessity” is positioned as being in terms of determination of inspections – we feel this element of the policy needs further expansion.
- *Reporting and Evaluation:* there is a need to evaluate the policy and to explain how that will be done, and to measure the effect of changes in approach to regulation in particular; we submit that specific pilots and approaches should be regularly evaluated as a policy matter to promote innovation in approach.
- *Enforcement:* Detailed reporting on non-compliances, the enforcement actions taken and the rationale for same, needs to be part of the policy approach in order to ensure transparency, fairness and to promote a culture of awareness that action will be taken and to support a drive within the agency.
- *Strategic Environmental Assessments:* we would like to see an increased EPA role here, many government plans and programmes are produced without an SEA.
- *Communications and Education:* Reports should be synopsised. When reports are large, the press officer should notify the Environmental Pillar in advance, to allow us to set aside time so we can read the report in full and issue a timely press release. The public should be alerted anytime EU / WHO guidelines are breached, this should be done through local and national media.  
It is difficult to access information on the website, the search function could be improved and as the website is often the point of contact for people phoning with

environmental complaints, the phone number and contact email should be easy to find.

- *Education*: The Environmental Pillar welcomes the EPA’s involvement in schools, and would like to see local schools monitoring their own environment, air/water quality, radon levels, etc  
[<http://environmentalpillar.ie/environmental-pillar-respond-to-draft-epa-regulation-compliance-and-enforcement-documents/>]

### 1.3 Taxation

- Taxes should be diverted from income and transactions to the use of the natural and social commons. The resultant receipts, less necessary investment to protect or build commons capital, should be broadly distributed to citizens on an equal per capita basis. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Introduce a Site Value Tax. Implement a property tax based on the value of all zoned residential land, extending it to all development land in replacement of commercial rates. [Policy Statement on Site Value Tax ]
- Employment Impact Assessment of Property Tax Options. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Establish an administrative structure to analyse and develop proposals to shift taxation from production and labour to resource use and pollution. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Maintain and increase fuel taxes. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

### 1.4 Subsidies

- Abolish PSO to peat fired electricity production. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

- Abolish Tax exemption of employee parking spaces. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Establish a task force to report on all other subsidies including those which operate by tax exemption[ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Abolish red diesel in favour of tax rebates in agriculture and other forms of support/ rebates for fishing which support conservation[ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- The Irish Government, the EU, its Member States and European Financial Institutions to cease providing financial or political support to shale gas, oil and coal bed methane development projects. Furthermore any financial and political assistance provided to shale gas projects in countries of the Global South should be redirected towards the production and promotion of renewable energy sources and energy savings, in line with the Millennium Development Goals. [Environmental Pillar Policy on Shale Gas, Shale Oil, Coal Bed Methane and ‘Fracking’ <http://environmentalpillar.ie/environmental-pillar-policy-on-shale-gas-shale-oil-coal-bed-methane-and-fracking/>]

## 1.5 Monetary Policy

- Establish a think-tank to investigate mechanisms for moving away from debt based money and for developing local currencies. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Government debt levels should be judged relative to economic conditions and how the borrowing is used rather than simplistic percentages. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]

## 1.6 Reform of the Euro

- Engage with EU partners to reform the Euro and its governance so that it is capable of fulfilling its role in a sustainable economy. [

<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

## 1.7 Employment

- Introduce a “Green Jobs Guarantee Scheme” for anyone who needs work at the minimum wage, to tackle ever increasing need for work to be done to protect and enhance the environment and protect our heritage. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Explore the employment opportunities emanating from sustainable peatland management, conservation and restoration. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Remove the obstacles that prevent social welfare recipients from volunteering. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Reduce the working week to alleviate unemployment and reduce consumption pressure and associated environmental impacts. [  
<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

### Action Plan for Jobs 2015

The concept of greening the Irish economy needs to be central to our economic recovery. The only viable economy will be one built on the principles of efficiency, recognising the measured observable limitations of the environment on which all of our industries depend. In this context, greening the economy should be at the heart of the Action Plan.

- **Natura 2000 :**
  - Develop management plans for Natura 2000 network with specific policy outcome of job creation.
  - Maximise draw down of Pillar 2 funding under CAP, to allow for significant investment in the network with a specific focus on creating employment through

recognition of the role of natural capital in the sustainability of our economic recovery.

- **Socio-Ecological Employment Scheme:**
  - Create a register of approved local environmental community groups that can become conduits for delivery of back to work schemes.
  
  - Amend back to work schemes (or create new scheme) to allow registered community and environmental groups to assist in reducing unemployment numbers.
  
- **Social Housing – Town Centre regeneration:**
  - Focus social housing development on the refurbishment of existing town/village centre residential properties.
  
  - In conjunction with an appropriate third level institution, assess the availability of vacant or derelict residential properties in depressed towns and villages, together with their viability for restoration. Identify pilot locations.
  
  - Conduct a participatory “ Planning for Real” type exercise in each pilot [ <http://www.planningforreal.org.uk/> ]
  
- **Living Laboratories:**
  - DES ( Department of Educations & Skills ) establishes institution wide processes in each of the three Green Campuses. This will provide a route by which third level institutions can become living laboratories for a sustainable Ireland, and drivers for green job creation.
  
- **Coastal Flood Defences:**
  - The creation of a data base and recognised network of ‘Sea Wall Reporters’ and ‘Sea Wall Keepers’ would help address the lack of information and the maintenance problem with our coastal flood defences.
  
- **Resource Efficiency:**
  - Convene a consultative committee on Resource Efficiency which will include representatives from government, private industry, SME (Small Medium Enterprises) sector and The Environmental Pillar.
  
  - Publish and implement the national Roadmap on Resource Efficiency. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

## 1.8 Training

- Government should support innovation and creativity in the training methodologies alongside the more traditional training courses. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

## 1.9 Procurement

- Government Policy should be based on ‘Sustainable Public Procurement’, where this incorporates Social, Economic and Environmental Sustainability. [Submission on the Draft Green Public Procurement National Action Plan <http://environmentalpillar.ie/rio20-taking-action-for-a-sustainable-future/> ]
- There should be a single integrated sustainable procurement framework for all public authorities. The “twelve step” process could be a useful tool in this. [Submission on the Draft Green Public Procurement National Action Plan <http://environmentalpillar.ie/rio20-taking-action-for-a-sustainable-future/> ]
- The authorities should question the need for the purchase in the first place. Can existing products or equipment be used instead of buying new goods? Can the requirement be met by hiring or sharing instead of purchasing? [Submission on the Draft Green Public Procurement National Action Plan <http://environmentalpillar.ie/rio20-taking-action-for-a-sustainable-future/> ]
- The Most Economically Advantageous Tender must include full life cycle costing and be calculated using an appropriate weighting for sustainable criteria. These should include fair-trade and ethical criteria, where appropriate. Tenders should not be judged simply on the lowest price. To do this there is a need to develop green specifications and contract weighting tools. [Submission on the Draft Green Public Procurement National Action Plan <http://environmentalpillar.ie/rio20-taking-action-for-a-sustainable-future/> ]
- Guidelines for implementation of the Plan should include targets for each body at least based on the following criteria: the proportion of procurement staff given sustainability training within a certain time period; the proportion of contracts in place upon which a sustainability risk assessment has been carried out; the proportion of procurement spend covered by sustainability initiatives with existing suppliers; and the number of high risk supply chains for which sustainability audits have been carried out. [Submission on the Draft Green Public Procurement National Action Plan <http://environmentalpillar.ie/rio20-taking-action-for-a-sustainable-future/> ]
- Sustainable procurement criteria should be incorporated into all key contracts focusing initially on those which are high spend, have a high environmental impact and are easily influenced. [Submission on the Draft Green Public Procurement

National Action Plan <http://environmentalpillar.ie/rio20-taking-action-for-a-sustainable-future/> ]

- Build capacity - a flexible framework must be developed to enable public sector organisations to benchmark their own capability. [Submission on the Draft Green Public Procurement National Action Plan <http://environmentalpillar.ie/rio20-taking-action-for-a-sustainable-future/> ]
- A clear commitment to green public procurement is needed from the Cabinet through to general secretaries, local authority members and chief executives in all public bodies. [Submission on the Draft Green Public Procurement National Action Plan <http://environmentalpillar.ie/rio20-taking-action-for-a-sustainable-future/> ]
- Prioritise the proactive implementation of “Green Tenders – An Action Plan for Green Public Procurement. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Adopt BS 8903 - Principles and Framework for Procuring Sustainably - for all public bodies and promote its adoption by the private sector. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

## 1.10 Investment programmes

- Encourage investment in productive import-substituting activities such as renewable energy and to develop knowledge and expertise in environmental services for export. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Ensure that all major government investment programmes directed at job creation are based on an objective assessment of projects which could be included. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Ensure that the assessment considers how many jobs are likely to be created by each of the measures, policies or projects being compared for inclusion. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

- Ensure that the assessment also considers the impact of the projects on sustainability indicators including compliance with EU law and meeting national emissions targets. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Ensure public health and knock-on benefits (reduced medical costs, better productivity/reduced absenteeism and better educational results) are included in the factors to be taken into account in deciding on expenditure and investment. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Establish a fund to provide matching finance and support in making applications for drawing down a range of EU resources. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

### 1.11 Sustainability in the Private Sector

- Encourage the incorporation of sustainability considerations and analysis in private sector decision-making, such as new reporting requirements for limited liability companies. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Encourage a step of Corporate Social Responsibility. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

### 1.12 Planning

- The life of planning permissions must not be extended. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Projected population figures for planning be updated taking account of emigration. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Continuing review of the Planning Acts in-case they prevent sustainable development. [Environmental Pillar Proposals for the Programme for Government

2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]

- Plans must be consistent with each other at all levels. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
  
- Existing excessive land zoning to be curtailed. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
  
- Remove planning function from Port companies. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
  
- Create an explicit environmental remit for County/City Development Boards. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]

### 1.13 Innovation

- The government works to establish a process of change in which all third level institutions become living laboratories for a Sustainable Ireland, for the Green Economy and as a driver for green job creation. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
  
- Use the Green Way as a prototype to promote similar Cleantech clusters around the larger urban centres. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
  
- Create ‘Wildlife Crime Officers’ managed through the EPA, NPWS and AN Garda Síochána to reduce infringements of wildlife legislation, with state solicitors advised

to secure fines that support environmental NGOs and the Wildlife Crime corp. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

### 1.14 Cooperatives

- Update the legislation governing Cooperatives to give a level playing field for all enterprises. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

### 1.15 Local and Community Development

[ <http://environmentalpillar.ie/local-and-community-development/> ]

- The Environmental Pillar has one underlying principle for Local Community Development – it must be Sustainable and based on the Rio principles
- Below is the summary of the Environmental Pillar’s key points regarding ‘A Draft Framework Policy for Local and Community Development’ which can be found at :

[<http://www.environ.ie/en/AboutUS/PublicConsultations/2015/>]

- This document is not based on the Rio principles and needs to be
- The Environmental Pillar notes the lack of specific ‘ Environmental Sustainability’ in the ‘Vision Statement’ underpinning this framework
- Given the lack of ‘ Environmental Sustainability’ in this framework document, the Environmental Pillar is calling for a seat on the National policy Group (Objective 4.1)
- We recognise and have been heavily involved in the advent and continuing development of the Public Participation Networks as a means of Public Participation and Access to Information. This Framework should be based on the PPNs but it is not and there are only fleeting references to PPNs within the document. The PPNs urgently need serious funding to achieve these ends and to allow proper capacity building of community groups - otherwise they will be seen by the volunteers that are working their best to ensure their success as a cynical Government ploy.

### 1.16 Trade agreements, TTIP, CETA and TISA

[<http://environmentalpillar.ie/the-environmental-pillar-policy-on-the-ttip-ceta-and-tisa/>]

- The Environmental Pillar denounces the lack of transparency of the negotiations, the lack of democratic participation in the development of the negotiation mandate and the lack of democratic control over the negotiations regarding the Transatlantic Trade and Investment Partnership (TTIP) and the Comprehensive Economic and Trade Agreement (CETA) currently being negotiated between the EU and the USA, and the EU and Canada, respectively, as well as the Trade in Services Agreement (TISA).
- The Environmental Pillar are opposed to trade agreements between the EU and the USA and Canada, and between the members of the World Trade Organisation which would serve the interests of corporations at the cost of citizen's rights and interests and those of our environment, and which would serve to:
  - Undermine democracy and the rule of law: The agreement allows foreign corporations to sue countries for punitive damages in secretive arbitration proceedings when countries pass laws that could reduce their profits.
  - Promote the extension and intensification of economic institutions and practices which undermine the health of the planet and its ability to provide for humanity, by marginalising sustainable development rather than putting it at the heart of global economic activity in line with the commitments entered into at the Rio Earth Summit in 1992 and in many subsequent international agreements.
  - Open the door to privatization: The agreement will make it easier for corporations to earn profits from the public water supply and health and education systems.
  - Endanger our health and environment: Practices that are legally allowed in the U.S. and Canada would be legally permitted also in the EU. This would clear the way for fracking and the production and import of genetically-modified food and hormone-treated meat. The agreement weakens animal welfare standards and small scale family farming and grants the agribusiness industry even more power.
  - Undermine freedom: The agreements open the way for even more monitoring and surveillance of internet users. Excessive copyright regulations restrict free access to culture, education, and science.
  - Are practically irreversible: Once agreed upon, the contracts are essentially no longer amendable by elected politicians as any change requires the agreement of all parties. No country could unilaterally decide to withdraw from the contract, as it is the EU which enters into the agreement.
- As a consequence the Environmental Pillar will:
  - Support the European Citizens' Initiative against the TTIP and CETA .
  - Work with other Irish NGOs to raise awareness and campaign to open up these processes to public scrutiny and participation.
  - Work to ensure that the EU does not sign up to any agreement that has any of the consequences outlined above

## 1.17 National Risk Assessment 2015

<http://environmentalpillar.ie/national-risk-assessment-2014/>

- *Biodiversity*: Ireland’s Biodiversity equals resilience, and we must identify and manage all threats to biodiversity in order to ensure a resilient future for the country.
- *Agriculture*: The emphasis on increased beef and dairy production is totally misplaced, in light of stronger emission controls that will become obligatory on Ireland in the future.
- *Forestry*: Monocultures dependent on chemical applications designed for clear-fell is not a sustainable model. A robust forest of mixed species of native provenance stock that allows for selective felling of different aged trees can provide a solution to the threat.
- *Tourism*: Ensuring that environmental issues receive equal consideration in risk assessments with the other aspects of sustainability is critical to ensuring the protection and enhancement of our natural capital on which our tourism industry is so dependent.
- *Health*: The cost in terms of harm done to the health and well-being of the people of Ireland and as a consequence to the Irish economy by environmental degradation is large, though difficult to put a figure on. The impacts of climate change are likely to increase these impacts.
- *Greening the Economy*: Greening the economy needs to appear at the heart of all economic decisions and threat identification. Ireland’s dependence on the current level of Foreign Direct Investment (FDI) is not sustainable. Import substitution must become part of any sustainable job creation policy, and this should be based on the development of a circular economy.

## 2.0 Sectoral Policies

### 2.1 Energy

- Push for higher targets for Green House Gas reductions in the EU. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Develop and implement an effective Pay As You Save scheme. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Restore the grants for thermal retrofit to their previous levels. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Promote closed cycle local Biomass projects nationally. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Establish a ring-fenced tax on all fossil fuel exploitation to be used to drive the move to renewable energy production, efficiencies and home energy retrofits. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Pursue a cross-border harmonisation of rules applicable to solid fuels. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Invest in decentralised provision of innovative power supplies from a wide range of sources to ensure greater energy security and thriving local economies. [

<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

- Develop two new HVDC interconnectors for the export of renewable power in public ownership with European financing. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Until the many environmental and human health problems identified with unconventional gas extraction are adequately addressed, no further shale gas, shale oil and coal bed methane activities should proceed. We call on all the Irish Government and the European Commission to suspend all on-going activities, to abrogate permits, and to place a ban on any new projects, whether exploration or exploitation. [Environmental Pillar Policy on Shale Gas, Shale Oil, Coal Bed Methane and ‘Fracking’ <http://environmentalpillar.ie/environmental-pillar-policy-on-shale-gas-shale-oil-coal-bed-methane-and-fracking/> ]
- Plan the grid to maximise the penetration of Renewable Energy. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Plan properly the required interconnections, storage, gas-fired peaking plants and base load generating stations. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Ramp up to an annual programme of 40,000 home insulation retrofits with all the consequent benefits, as well as programmes to increase the efficiency of all heating systems. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]

## Community Energy

[ <http://environmentalpillar.ie/environmental-pillar-policy-on-community-energy/> ]

### **Access to the National Electricity Grid for communities and micro -generation**

- The definition of ‘innovative’ projects should be widened to include for community energy projects, thereby facilitating easier access for community energy projects onto the grid
- Costs associated with Grid connection should not be prohibitive, and should be in line with the Renewables Directive .Connection fees should be appropriate to the scale of the installation, to ensure small to medium size installations do not bear a disproportionate level of cost.

- Mandate electricity utility companies to enter into Power Purchase Agreements (PPAs ) with small generators, with a low cost / admin model, so that small generators can receive payments for the electricity they export to the grid .

#### **Fair and secure payments for all Renewable Energy generated**

- Clarity should be provided on Feed in Tariff rates for post 2017 when the Renewable Energy Feed (REFIT) scheme expires.
- Fair and secure payments to support community energy, micro- generation and auto generation, at a price that balances the long term socio-economic cost of this generation with the total net metering price and ensures the Public Service Obligations ( PSO ) levy is maintained at close to current levels. This will ensure community renewable energy generators will get paid for the electricity they export to the grid.

#### **Funding and Finance supports**

- Grant and grant-to-loan making facilities should be developed to provide funding in initial stages of development and pilot stages, from feasibility studies through to planning applications and grid applications.
- Encourage tax efficient structures for local ownership of renewable energy, as per the Danish model where income earned up to a point from Community Renewable Energy is tax free.
- Funds from the SEAI Better Energy Communities should be expanded to enable funding for community initiated and led schemes to generate and distribute their own energy.

#### **Facilitate the development of Community Micro Grids**

- The barriers preventing self-sufficiency, local grids, off grid communities and electricity sharing should be removed.
- There should be no pressure to connect every installation to the national grid
- Research and Development funding should be made available to support the development of a number of demonstrations or test areas in Ireland.

#### **A National Community Energy Strategy for Ireland**

- A National Community Energy Strategy for Ireland is proposed and should outline the following:
  - o A requirement for the establishment of intermediary bodies and information on how these intermediaries will be facilitated to support communities.
  - o Targets for community energy generation
  - o A framework that ensures all Local Authorities develop local ‘ Energy Action Plans ‘

- A Framework that ensures facilitated public engagement and participation in national and local energy policy and planning.

### **Targets for Community Energy Ownership and Co-ownership**

- A national target for community led and community owned renewable energy developments.
- Within developer – led projects, a requirement that a minimum proportion of each development is owned by individuals and communities local to the development.

### **Intermediary bodies**

- It is recommended that funding for Energy Agencies is increased so that each Local Authority area is serviced adequately with support. Energy Agencies should be developed to offer a ‘one stop shop’ support services with hands on assistance for communities developing community energy projects.

### **Local energy Action Plans**

- A fully participative consultation process should precede the adoption of any plans to allow communities, individuals and interest groups to engage with energy policy in their local areas and help to shape solutions to achieving a sustainable energy future.
- **Facilitated Public Participation and Engagement with National and Local Energy Policy**  
New energy generation and infrastructure cannot be seen as something that is done to or imposed on a community. Communities and individuals must be part of the process, part of the discussion and have an active role in the solution.

### **Green Paper on Energy 2015**

<http://environmentalpillar.ie/environmental-pillar-submission-to-dcenr-on-the-green-paper-on-energy-policy/>

- The White Paper should define a vision for Ireland’s Future energy which provides an overarching framework within which decisions on energy policy are made. Given the risk of runaway climate change, this vision should define a future system that is no longer dependent on climate polluting fossil fuels, but rather operates with clean renewable indigenous resources and energy conservation at its core.
- The three dimensions of sustainability - Environmental, Social and Economic - should underpin every choice on energy policy. This requires nothing less than a complete transformation of the energy system. This visionary approach, or intentionality in plan

making is supported by the recent NESC Research on Wind Energy in Ireland - Building Community Engagement and Social Support<sup>3</sup>

- EU targets for renewable energy in all sectors including transport and reducing energy demand should not be considered a ceiling. Ireland’s energy policy can and should be more ambitious than EU targets.
- In addition to being informed on energy policies decisions, individuals and communities must be allowed to evolve into active ‘energy citizens’, rather than remaining in the ‘passive energy consumers’ role that is currently prescribed. Government policy should make it easier for communities, individuals and businesses around the country to take control of their own energy needs through saving energy and generating their own renewable energy.
- The Focus on energy prices in the Green Paper and current policy is misplaced because many of the factors influencing price are outside Government control. Policy should focus on overall energy costs, placing greater emphasis on cost control by reducing consumption and increasing efficiency.
- Introduce a taxing mechanism that enables the switch to a low carbon economy, the tax should be flexible to fall as low carbon technologies overtake fossil fuels, or increase if targets are not met
- The use of fossil fuels in Ireland needs to be phased out. We spend €6.5 billion annually importing fossil fuels for over 90% of our energy needs. The dirtiest fossil fuel plants, peat and coal, should be closed immediately with the long term aim of phasing out gas too.
- In order for consumers to reduce the amount of energy they use, energy supply companies should be encouraged to make it easier for their customers to use less, and this must be financially attractive for suppliers to generate and sell less energy.
- A moratorium on fossil fuel exploration should be instigated, in line with the recommendations contained within the recent IPCC reports, which explain that to prevent runaway climate change globally over 60 % of fossil fuels need to remain in the ground. New exploration is contradictory to this advice.

## **Joint Statement on Biofuels**

### **The role of bioenergy in the EU climate and energy policy post 2020**

[ <http://environmentalpillar.ie/pitfalls-and-potentials-the-role-of-bioenergy-in-the-eu-climate-and-energy-policy-post-2020/>]

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<sup>3</sup> NESC 2014 Wind Energy – Building Community Engagement and Social Support, available at -<http://www.nesc.ie/en/publications/publications/nesc-reports/wind-energy-in-ireland-building-community-engagement-and-social-support/>

- Four main safeguards must be included in the EU’s 2030 climate and energy policy framework to ensure that bioenergy makes a sustainable contribution after 2020. The environmental Pillar urges the EU institutions to take into account the following policy recommendations:
- *Introduce a cap to limit the use of biomass for energy to levels that can be sustainably supplied:* the methodology to identify an appropriate EU wide cap for all bioenergy should be based on modelling of domestic, sustainable potential under strict, comprehensive criteria.
- *Ensure efficient and optimal use of biomass resources, in line with the principle of cascading use :* biomass should be used to create materials and products first, and the energy content only recovered later, while respecting the waste hierarchy that requires a product first be reused and or/recycled  
[ EU Waste Framework Directive ( 2008/98/EC ) ]
- *Include correct carbon accounting for biomass:* All biomass that receives support and subsidies under EU law should be subject to comprehensive accounting of carbon emissions and minimum requirements for the delivery of real emissions and minimum requirements for the delivery of real emission savings. It is imperative that carbon debt ( ie., changes to biogenic carbon stocks over time ), which is particularly relevant for forest biomass, is also taken into account. The use of bioenergy must result in real cuts in carbon emissions in policy relevant timeframes to keep global warming below a two degrees Celsius rise.
- *Introduce comprehensive and binding sustainability criteria:* in order to ensure that only sustainable forms of bioenergy are promoted, robust safeguards that cover environmental and social impacts are needed. In particular, biomass production must not cause direct or indirect destruction or degradation of forests or other ecosystems with high biodiversity and / or carbon storage value. Complimentary policies should also be pursued to help reduce pressure on biomass resources as bioenergy expands, such as reuse and recycling of biomass resources, reduced demand for energy, improvements in agricultural yield, and investment in integrated food energy systems ( IFES )

## 2.2 Climate Change

- A strong and effective Climate Change Act to be introduced which is capable of positioning Ireland as a leader in the international fight against climate change. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the->

[programme-for-government-2011-onwards/](http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/) ]

- Such an Act should include a legally binding 2020 domestic mitigation target of a reduction of 30% on 2005 emissions, and a legally binding 2050 target of 90% reduction on 1990 emissions. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Provision for the setting of 5-year interim targets (if not three year) by Government. This would be aligned with the electoral cycle of political accountability and would be a spur to timely action. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- The establishment of a National Climate Change Commission to supervise and advise a fully coherent and integrated Government response capable of delivering international leadership on climate change. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Provision of € 420 million annually as fair share of international UN financing for mitigation, adaptation, and forest protection in developing countries. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- 1% of GDP should be set aside annually for national and international decarbonisation and adaptation (additional to achievement of 0.7% Overseas Development Aid objective, with full 0.7% Overseas Development Aid objective to be immediately fully climate proofed). [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Immediate introduction of carbon tax of € 30 per tonne, escalating by an additional €5 per tonne annually for non-traded sector. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- The establishment of a National Decarbonisation Fund to manage carbon tax revenue (as part of the 1% GDP set-aside) for decarbonisation, adaptation, and developing country development objectives. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- A strong domestic compliance regime to include short term, medium term, and longer term mitigation, renewable energy and energy efficiency targets embedded in

national legislation. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]

- The Irish Government should acknowledge the national importance of peatlands as a major carbon store, the role of pristine and restored peatlands as carbon sinks, and the potential of degraded peatlands to enhance the greenhouse effect. Peatland conservation and restoration should be a priority of Ireland’s Climate Change Adaptation Strategy. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]

### 2.3 Nature Conservation

- Develop and adopt new and improved domestic wildlife legislation with associated enforcement, particularly for wildlife crime. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Develop and implement a National Biodiversity Action Plan. Ensure public consultation of the draft prior to its final adoption. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Pass the Environmental Liability Bill and fully implement the Environmental Liability Directive. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Adopt an overarching public policy which ensures an ecosystem-based approach to protecting and managing our natural resources, and which addresses perverse incentives and unnecessary policy conflicts. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Support the development of biodiversity indicators in quality of life and sustainable development indicators and in measures of sustainable growth. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]

- Fully comply with and implement the EU Habitats Directive and EU Birds Directive and the Convention on Biodiversity in order to afford protection to biodiversity of national and European importance. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Ensure a formal statutory declaration of proposed Natural Heritage Areas (pNHAs) under the Wildlife Acts (1976 & 2000). [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Implement and Enforce the Flora Protection Order. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Integrate biodiversity policy across all sectors, particularly agriculture, fisheries, energy, marine and transport. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Implement the cessation of turf cutting scheme on all SAC's and NHA's with the appropriate compensation measures and fuel alternatives. Publish the Bogland Project – a sustainable management plan for the peatlands of Ireland. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Include conservation in economic stimulus packages as an important part of the Green Economy. <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Ensure R&D Funds for strategic collection of marine and terrestrial wildlife data. This will employ consultants in small to medium businesses and also help to inform sectoral decision-making in areas of further employment (wind energy, use of marine resources etc). <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Secure our natural capital through funding nature conservation work, 'accounting for nature' sooner rather than later in policy development and in decision-making as a matter of urgency and link this to performance indicators that go 'beyond GDP'.  
<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Provide assistance to those interested in putting together LIFE+ projects.  
<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>

[employment/ \]](#)

## 2.4 Water

- A National Water Authority with regional River Basin District offices should be established and charged with integrated management of all aspects of river basin (catchment) planning, including actively promoting public participation. [Environmental Pillar Proposals for the Programme for Government 2011 onwards [http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/ \]](http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/)
- Investment in wastewater treatment infrastructure which is sufficient to meet our EU law obligations and bring our waterways and water abstraction sources to good status. [Creating Sustainable Employment by Greening the Economy]
- Stimulate the water conservation industry. [Creating Sustainable Employment by Greening the Economy]

### Water Services

[\[http://environmentalpillar.ie/wp/wp-content/uploads/2015/06/Environmental-Pillar-Water-Services-Policy.pdf \]](http://environmentalpillar.ie/wp/wp-content/uploads/2015/06/Environmental-Pillar-Water-Services-Policy.pdf)

- **Water Charges:**
  - The Environmental Pillar supports domestic water charges based on a pay-for-use basis through metering. The current rate schedule of charging without regard to the amount of water used is the worst of all worlds and does not have the intended result of encouraging a reduction of water usage and resembles more of a tax rather than a user charge, like other utilities.
  - Those who can pay, should pay, and those that cannot pay should receive assistance.
  - Private consumer rates must be lower than commercial rates
- **Water Conservation and Protection Measures:**
  - To encourage additional water conservation, the government should provide free low flow shower heads or toilets, or allow tax relief at the standard rate for the installation of systems that reduce water consumption and /or the installation of rainwater harvesting systems to reduce demand on treated water supply.
  - The current septic tank grant programme should be extended to assist financially-strapped households to upgrade non-compliant septic tanks as a matter of urgency. The grant programme should not be limited to the small

amount of septic tanks that have been inspected and failed to meet quality standards.

- The government should initiate a ' De-sludge Your Septic Tank ' public awareness campaign.

– **Licensing**

- All water discharge licences must be issued through a national regulatory entity such as EPA or an Irish water authority.
- There must be three-way communication between EPA, the Irish water authority and the RBD ( River Basin District) offices when issuing discharge permits to ensure that such a discharge will not overload the river basin capacity
- A data base of all current abstractions, both licensed and unlicensed must be compiled and available on a central publicly accessible site.
- Abstraction licensing, on-site wastewater systems licensing and land drainage decisions must all be done through the EPA

– **Water Fluoridation**

- As ten councils representing over 2 million people have voted to ban the fluoridation of drinking water and as the practice costs the State upwards of €5 million per year, the Environmental Pillar call on the government to stop this action at once.

– **Climate Change**

- Climate change prevention and adaption measure must be integrated into all planning and implementation of water services.

## 2.5 Sustainable Agriculture

- Support the Greening of Pillar 1 of the CAP and increasing Pillar 2 to 50% of the CAP budget. [Creating Sustainable Employment by Greening the Economy]
- Prioritise a national debate on the EU Bioeconomy Strategy. [Creating Sustainable Employment by Greening the Economy]
- Develop a wild food policy framework to support the wild food sector. [Creating Sustainable Employment by Greening the Economy]
- Develop a wool fibre insulation industry to meet Irish and UK demand for insulation as our housing stock is retrofitted. [Creating Sustainable Employment by Greening the Economy]
- Support an accelerated move towards organic farming and organic horticulture. [Creating Sustainable Employment by Greening the Economy]

- Support the development of specialist and niche horticulture. [Creating Sustainable Employment by Greening the Economy]
- Food Harvest 2020 to be subjected to a screening under the Habitats Directive, and Appropriate Assessment. It also needs to be subject to a Strategic Environmental Assessment to comply with Ireland’s legal obligations. [Submission on Environmental Analysis of Scenarios Related to Implementation of Recommendations in Food Harvest 2020 (FH2020)  
<http://environmentalpillar.ie/submission-on-environmental-analysis-of-scenarios-related-to-implementation-of-recommendations-in-food-harvest-2020-fh2020/> ]
- Adaptation and resilience to climate change need to be considered in the assessment of both the implementation of Food Harvest 2020, and analysis of its impacts. [Submission on Environmental Analysis of Scenarios Related to Implementation of Recommendations in Food Harvest 2020 (FH2020)  
<http://environmentalpillar.ie/submission-on-environmental-analysis-of-scenarios-related-to-implementation-of-recommendations-in-food-harvest-2020-fh2020/> ]
- Support the creation of an environmentally sustainable Agriculture sector that ensures delivery of an effective agri-environmental scheme including impact assessments and monitoring of outcomes, in order to demonstrate value for money in delivering the public benefits of clean waters, healthy soils and a stable atmosphere. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- The encouragement of on-farm waste to energy and fertiliser management including the full implementation of the Nitrates Directive. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Introduce a targeted grant aid scheme that rewards practices which reduce greenhouse gas (GHG) emissions on farms. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Convene a national debate on food security involving the full range of stakeholders to establish a widely agreed strategy by the spring of 2012. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]

- In order for Ireland to maintain its green image as a producer of good quality sustainably produced food, and the jobs that go with that image, a moratorium on the import or cultivation of GM crops should be introduced. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Establish a number of agro-forestry pilot projects around the country which could become centres of excellence for awareness, education and training, whilst adding to the job creation potential of agroforestry. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]

### **DAFM's discussion document on the potential for GHG mitigation within the Agriculture and Forestry Sector**

<http://environmentalpillar.ie/environmental-pillar-submission-to-the-department-of-agriculture-food-and-the-marine-on-ghg-mitigation/>

The Agriculture Sector Mitigation Action Plan sets four key focuses but decreasing total annual emissions is not one of them. The Environmental Pillar urges DAFM to consider the following points in revising the Mitigation Plan:

- **Food security, development and climate change** : the projected growth in global consumption of livestock products by wealthier consumers and the resultant emissions is simply unsustainable and will have to be constrained over time.
- **Existing threats to Irish Agriculture and as predicted to develop from climate change**: agriculture is one of the most climate-sensitive industries in Ireland, given that production is heavily dependent on levels of rainfall and temperature. Efforts must focus on minimising the threat by reducing GHG emissions.
- **Global Demand predictions for meat and dairy and how they relate to the 2 degree target**: on the current high emissions pathways the remaining global carbon budget for a 2 in 3 chance could be exhausted within as little as seven years, or fifteen years at the most. [Anderson K ( 2015 ) February 2015 Presentation, Tyndall Centre. ] Year on year continuous and significant reductions in emissions need to begin now.
- **Technical options for meeting food needs with lower GHG intensity including meat alternatives; credibility of current demand predictions in the light of technical options**: food options with lower GHG impacts generally have lower demand for land and water and are more affordable, therefore contributing simultaneously to

emissions reduction and to optimal nutrition. Unfortunately, much of the terminology in the consultation paper implies that the opposite is the case.

- **Global demand predictions and public health:** the consultation paper doesn't refer to the public health aspects of predicted increased demand for meat and dairy.
- **What are the best points in the production and consumption chain to apply pressure for emissions reduction?** : increasing cattle numbers, as is forecast and is occurring under FH2020, is now steadily increasing Ireland's emissions from agriculture. All of these facts indicate that reducing cattle numbers in particular is an important lever in achieving emissions reduction.
- **Carbon leakage and agricultural emissions, including how relevant is it in circumstances where all major emitters adopt targets:** a realistic pricing of the climate pollution from all sectors of the economy including agriculture would raise large revenues to invest in carbon sequestration, by peatland restoration and afforestation, and in, preferably community owned, renewable energy projects.
- **Considerations for addressing agricultural emissions at various points in the production and consumption chain:** Taxing and capping climate pollution at source, the polluter pays principle, needs to be adopted as an essential part of a national mitigation plan that will drive change to lowering emissions in each part of the production and consumption chain.
- **Relationship between agricultural adaptation to climate change and other environmental goals:** the relationship of mitigation and adaptation needs to be seen in the very difficult context of the extremely limited and rapidly depleting total global carbon budget for a likely chance of limiting global warming to 2°C.
- **Relationship between agricultural GHG mitigation and adaption and other public goals including public health, employment, rural development and economic profit (green jobs, opportunities for alternative land uses ):** we must lead by example at every level of Irish society from individual citizens to farmers to large businesses to government departments to understand the need for and act to achieve a transition to a low carbon future as rapidly as possible.
- **Food Harvest 2020 and the use of MACC (Marginal Abatement Cost Curve):** it is apparent that the role out of FH2020 will not be in accordance with an ecosystem approach. It needs to be revisited as there is an urgent need to apply ecosystem-based management principles and tools to farming practice. MACC as a tool has been criticised for its over simplification of complex scenarios.
- **Risks associated with high degrees of specialisation in agricultural production:** a policy which is taking predicted economies opportunities as its main justification needs to consider the risks that the predictions could be wrong and that it is making unhedged bets.

- **Policy Coherence:** the communications from the government are not coherent. The ambition of a 4 % decrease in emissions seems to have become a reality of a 9 % increase which highlights the need for a mid – term review of FH2020 that looks at the sustainability credentials of the implementation of this departmental strategy. It also points to the need for quantification of anticipated emissions reduction from each abatement measure.

## 2.6 Tree Cover

- The proposed new Forestry Bill must incorporate a revision of both the Forestry Acts of 1946 and 1988. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/>]
- National Afforestation policy should be concentrated on semi-natural woodland, composed mainly but not exclusively of native species. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
- There must be a ban on the sale of public lands if this contributes to deforestation. Where such a sale takes place then the full value of a sale must be reinvested in afforestation only. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
- Cross border co-operation focussed on the implementing EU measures to eliminate the import of illegally harvested timber should be a government priority. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]

- Stabilise funding and rationalise grant schemes through interdepartmental and international co-operation on RDP and climate change strategies. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
  
- Increase the resources of the Inventory and Research branches of the Forest Service in order that they can meet Ireland’s international obligations. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
  
- All Forest Service Guidelines need to be revised to ensure protection of biodiversity and water quality as part of all new planting and forest management operations and should be given statutory effect under the New Forestry Bill. Revised guidelines and a new ‘National Forest Standard’ need to fully incorporate the requirements of the Birds and Habitats Directives and the protection and improvement of the aquatic environment as per the Water Framework Directive. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
  
- Ancient and semi natural woodlands of conservation merit, other than those designated as part of the Natura 2000 network, need to be awarded strong legal protection and managed for their conservation interest and long term protection. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
  
- The Social Partners must be involved at all stages in the development and review of Coillte, and Forestry Policy and Legislation. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
  
- All identified old/ancient woodland sites should be reinstated after first rotation. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
  
- The administration of public Tree-Cover must be restructured while maintaining public ownership of Coillte’s Forest Assets. A multi stakeholder leasing model should be considered. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
  
- A new comprehensive National Forest Standard is a key requirement for achieving SFM in Ireland. This new National Forest Standard will enable delivery and integration of multiple objectives, including existing European and International commitments. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]

- Set as a policy goal the achievement of the "long-term multifunctional and sustainable forestry and innovative forest sector that fulfils present and future social, economic and environmental needs, and supports forest-related livelihoods". [Creating Sustainable Employment by Greening the Economy]
- Protect and promote the genetics of native woodlands. [Creating Sustainable Employment by Greening the Economy]
- Develop forest biomass based enterprises in particular local energy supply. [Creating Sustainable Employment by Greening the Economy]
- Develop wood-fibre insulation manufacturing to meet Irish and UK demand for insulation as our housing stock is retrofitted. [Creating Sustainable Employment by Greening the Economy]
- Support agroforestry pilots. [Creating Sustainable Employment by Greening the Economy]
- Plantation Forests must be redesigned and restructured to avoid clear-felling. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
- Ireland must be kept free of genetically modified trees. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
- A national SFM training programme for farmers, for various elements of the forest industry including foresters and contractors, and for regulators should be introduced. A full SEA (Strategic Environmental Assessment) should be carried out on the new National Forest Standard. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
- The use of Glyphosate (Roundup) as a management tool for controlling scrub etc. must not be permitted. A proper SFM management plan involving CTF and coppicing should always be the preferred option. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]
- Clearly defined limits on areas for clear-fell must be agreed. These limits and the promotion of Continuous Cover Silviculture in conifer stands must be linked to improved Carbon Accounting. [Tree Cover Policy <http://environmentalpillar.ie/tree-cover-policy/> ]

### **SEA for the Draft Forestry Programme 2014 – 2020**

[ <http://environmentalpillar.ie/draft-forestry-programme-2014-2020/> ]

Environmental Pillar recommendations and observations for the new Forestry Programme:

- **Afforestation and Creation of new Woodlands (Measure 4.1.):**
  - A realistic rate of afforestation must be funded allowing for natural regeneration. Grants for agroforestry should be increased to ten years in line with wood fibre production grants.
  - The afforestation programme should be based on 50% broadleaf with native provenance as an underlying principle.
  - Conifer dominated plantations should not be permitted in Natura 2000 and other ecologically sensitive areas.
  
- **Agroforestry (Measure 4.2):**

There is no emphasis on specifying use of native species with abilities to confer to multiple environmental benefits. The failure to propose the use of agroforestry for buffering to mitigate against worst excesses of N and P run off must be addressed.
  
- **Forestry Fibre (Measure 4.1.2.2):**

The Environmental Pillar is disappointed to see that the list of proposed species included under this measure includes such as eucalyptus, polar, hybrid aspen. They have the potential to become invasive. Hemp should be considered for this measure.
  
- **Forest Roads, drainage and archaeology (Measure 4.2):**

Monitoring for archaeology/ecology/water impacts should be part of the criteria for funding.
  
- **Reconstitution of woodlands (Measure 4.3):**

Increased use of native species has been proven to be less susceptible to climate pressure. The 50% broadleaf requirement should extend to this measure with a native stipulation.
  
- **Neighbourwood scheme (Measure 4.4):**

Emphasis should be placed on native species for all the known benefits, as well as the cultural heritage aspect which is currently ignored in our forest policy objectives. The introduction of imaginative crossing cutting measures would ensure that funding not drawn down for unrealistic afforestation targets can be redistributed across other forest schemes.
  
- **Woodland Improvement (Measure 4.5):**

For the Neighbourwood scheme, funding should be allocated specifically for invasive species management.

- Native Woodland Scheme (Measure 4.6):  
Under Element 1 recognition of natural regeneration via the succession process should be introduced to ensure that all aspects of native woodland creation are catered for. A new element needs to be introduced to target coastal areas. Native species adapted to coastal areas should be planted as shelterbelts to assist in our first line of defence against the Sea and Wind.
- Knowledge transfer/training (Measure 4.7.1.3):  
Targeted training should include continuous cover forestry; and low impact silvicultural systems including coppicing. A clear distinction needs to be made between training for tree farming and training for Sustainable Forest Management of native/semi natural woodlands to include agroforestry and hedgerow management.
- Forest Genetic Reproductive Material (Measure 4.10):  
All material dispatched from tree nurseries should include provenance certificates at point of sale for all RDP or State aided schemes including GLAS, to confirm that it is indigenous genetic stock or other identified sources.

## **EU Legally Binding Agreement on Forestry**

<http://environmentalpillar.ie/environmental-pillar-statement-on-an-eu-legally-binding-agreement-on-forestry-2/> ]

The Environmental Pillar calls on the Irish Government to actively seek the completion of the long overdue, EU Legally Binding Agreement on Forests ( LBA ).

The Environmental Pillar urges the Government to ensure:

- That the LBA has an improved focus on delivering the 1992 Rio Forest Principles in order to provide for the long term protection, conservation and restoration of EU Forests.
- That the LBA is based on multi – functionality, to include non – timber products including ecological services. It must set clear targets that are linked to strong and measurable indicators. It is essential that the LBA includes a clear definition as to what constitutes genuine Sustainable Forest Management.
- That the LBA ensures that strict environmental criteria are attached to all future EU forestry funding, while ensuring public participation in the monitoring and measuring of same.

- That access to all Forest Information be placed into the public domain, and for public participation to be granted an improved status in the LBA in line with the Aarhus Convention.

## 2.7 Marine

- The reformed CFP has as its main and primary objective the protection and conservation of the marine ecosystem, building resilient, healthy and diverse seas which leads to restoring the balance between fishing effort, fish stocks and the wider marine environment. To achieve this, the future CFP has to have an unconditional commitment to apply an ecosystem approach to fisheries management, incorporating a robust application of the precautionary principle. The reformed CFP has a stated obligation to achieving ‘good environmental status’ of all Community Waters in line with the Marine Strategy Framework Directive as well as maintaining and improving the ecological status of Natura 2000 and other merging MPAs networks. It must address the 5 structural failings listed here and fully integrate into the future CFP, the establishment and protection of Marine Protected Areas, integration of climate change considerations and the full integration of aquaculture into the 2012 CFP.
  - A Deep-rooted problem of fleet overcapacity
  - Imprecise Policy Objectives resulting in insufficient guidance for decisions and implementation
  - A decision-making system that encourages a short-term focus
  - A framework that does not give sufficient responsibility to the industry
  - Lack of political will to ensure compliance combined with poor compliance by the industry
- Ensure access to fish resources to those who fish in the most socially and environmentally responsible ways and who adhere to scientific advice – securing healthy fish stock and hence supporting fishing communities and associated jobs into the future. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Redirect fuel subsidy to transition package on sustainable low-carbon fishing with labelling and marketing support on an all-island basis [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]

- Establish Marine Protected Areas in 20% of Irish Waters. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Adhere strictly to ICES scientific advice in this year’s Fisheries Council negotiations to halt the overfishing of stocks. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Highlight, disseminate and further develop the areas where Ireland is truly a leader in the Green Economy – e.g. Sea Bass. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Prioritise the green securement of our marine and coastal ecosystems and their services including the natural defences against climate change impacts. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Halt the highest impact wild fisheries and aquaculture in and around Natura 2000 sites now. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Strengthen the research in the marine environment – not only in the welcome areas of green renewable energy etc. as flagged by government, but also in the inshore and coastal areas for both conservation and small scale multi use, where citizen science element empowers and informed coastal communities. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Create green Jobs through the timely, innovative and participatory implementation of marine law: the Marine Directive being the most urgent legislation to address. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- Following the implementation of the above there would be a need for training to shift the process of reform up a gear. [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]
- A generic list of all wild fishery and aquaculture activities in each Natura 2000 site together with their potential adverse individual and cumulative impacts should be made available to the Public. [Environmental Pillar response to the Department of Agriculture Fisheries and Food regarding the proposals for the opening up of inshore fisheries in Natura 2000 Sites 13/08/2009]
- A Strategic Environmental Assessment (SEA) should be carried out for each Natura 2000 coastal fisheries site as soon as possible and should progress rapidly with an agreed timeline of no more than 3 years. For sites where SEAs have not yet been produced, full agreement to ongoing monitoring is required. Fisheries should remain closed until an SEA is in progress, and should still require full appropriate

Assessment in advance of any decision-making regarding opening. [Environmental Pillar response to the Department of Agriculture Fisheries and Food regarding the proposals for the opening up of inshore fisheries in Natura 2000 Sites 13/08/2009]

- Appropriate Assessment should be carried out where required. [Environmental Pillar response to the Department of Agriculture Fisheries and Food regarding the proposals for the opening up of inshore fisheries in Natura 2000 Sites 13/08/2009]
- The development of sustainable fisheries including all forms of aquaculture and/or wild fisheries in each site must include a process of public participation. [Environmental Pillar response to the Department of Agriculture Fisheries and Food regarding the proposals for the opening up of inshore fisheries in Natura 2000 Sites 13/08/2009]
- The public must be included in the development of Fisheries Plans, SEAs, Conservation Objectives and Management Plans from the start of these processes. Information about the processes must be proactively disseminated allowing adequate time for the public to participate. [Environmental Pillar response to the Department of Agriculture Fisheries and Food regarding the proposals for the opening up of inshore fisheries in Natura 2000 Sites 13/08/2009]
- The public should also be involved in addressing known existing problems in Natura sites such as removal of invasive species, removal of boulders, identifying important areas such as Zostera beds. [Environmental Pillar response to the Department of Agriculture Fisheries and Food regarding the proposals for the opening up of inshore fisheries in Natura 2000 Sites 13/08/2009]
- Clear science-based and legally-backed guidelines must be drawn up regarding the introduction of non-native species into fisheries as soon as possible. [Environmental Pillar response to the Department of Agriculture Fisheries and Food regarding the proposals for the opening up of inshore fisheries in Natura 2000 Sites 13/08/2009]
- Non-selective fishing methods should be phased out through the development of a strategic plan for fisheries as soon as possible. [Environmental Pillar response to the Department of Agriculture Fisheries and Food regarding the proposals for the opening up of inshore fisheries in Natura 2000 Sites 13/08/2009]

## **EU Fishing Opportunities for 2015**

[ <http://environmentalpillar.ie/submission-european-commission-consultation-on-fisheries-opportunities-2015/> ]

- The overall Target of Ireland’s National Biodiversity Plan is “ *that biodiversity loss and degradation of ecosystems are reduced by 2016 and progress is made towards substantial recovery by 2020*” [ Department of Arts, Heritage and the Gaeltacht, 2011. Actions for Biodiversity 2011-2016: Irelands National Biodiversity Plan.] For these targets to be met, as for the meeting of the Common Fisheries Policy (CFP) objectives, setting the correct fishing opportunities is fundamental to achieving healthy fish stocks and a resilient marine ecosystem. Highlighted below are what The Environmental Pillar considers to be key points in relation to fishing opportunities.
- Article 2.2 of the Common Fisheries Policy (CFP) is an essential part of maintaining and restoring healthy fish stocks to above the biomass level of MSY (Maximum Sustainable Yield), and the Commissions Communication lacks information about the state of fish populations in relation to biomass levels capable of producing this. This must be rectified.
- With regard to proposing TACs ( Total Allowable Catch ) in line with MSY advice, it is essential that the Commission clarifies who must provide which evidence in such requests, including when, and by whom it is validated.
- The ICES advice on catch limits must be a precondition for any uplift in quota to reflect the introduction of landing obligations. Uplifts should be limited in scope to ensure that the total take out will not prejudice the MSY objective of the CFP.
- Any proposed delays to the 2015 MSY deadline must be made publicly available and should include a clear indication of how fishing mortality will be progressively and incrementally reduced to achieve the MSY objective as soon as possible but not later than 2020.
- The Commission must provide further information on how it defines applying the precautionary approach in a systematic, predefined and transparent manner for stocks where full scientific advice is not available. When applying the precautionary approach it is important to reduce fishing mortality and not only fishing opportunities.

## 2.8 Oceans

- The Environmental Pillar supports the designation of an ecologically coherent network of Marine Protected Areas. This network would significantly exceed the

number of marine SAC's designated by the NPWS by combining NATURA 2000, Ramsar sites, Marine Conservation Zones and NHA's (after the UK model). MPA's would enjoy a similar level of protection from exploitation and development as SAC's and SPA's and could be promoted by the tourism sector as Marine parks or nature reserves. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]

- Employment in the seafood sector could be significantly and sustainably increased by hiring observers for the Irish Fishing fleet. Such a scheme would not only help to improve compliance with regulation but would also fill important knowledge gaps in relation to by-catch and by-kill. Local coastal surveillance officers could have a similar role in relation to aquaculture operations and ports. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]
- Commercial Development should be obliged to contribute to a dedicated environmental fund that is used to finance, for example, observer and license enforcement schemes, construction of coastal erosion mitigation measures, and development of better selective fishing gear. This fund could also be used to remove coastal litter and abandoned and defunct infrastructure such as old aquaculture trestles and cages. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]
- The powers and resources of the Sea Fisheries Protection Agency should be enhanced in order to improve license monitoring and enforcement. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]
- There should be a greater emphasis on informing the public on planned coastal and marine developments. Independent Appeals Boards should provide for local community representation. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]
- A Red List of endangered marine species should be established so that conservation efforts can be targeted, as is being done for terrestrial species. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]
- The Wildlife Act should be extended to marine species which currently do not enjoy protected legal status. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]

- An Inshore Fisheries Forum with NGO and local community representation should be established. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]
  
- Marine Spatial Plans should emphasize the Ecosystem Approach and put mechanisms in place that guarantee environmental law enforcement and compliance. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]
  
- The Environmental Pillar calls upon the European Parliament, the European Commission and the Member States to work together to establish a European Whale and Dolphin Sanctuary throughout European waters. <http://environmentalpillar.ie/letter-calling-for-the-establishment-of-a-european-whale-and-dolphine-sanctuary/> ]
  
- Subsidies which incentivise large scale trawling should be discontinued. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]
  
- A Marine Authority should be created to coordinate the planning process at sea in an open and transparent manner, similar to that which exists above the high tide mark. [Our Ocean Wealth <http://environmentalpillar.ie/environmental-pillar-submission-our-ocean-wealth/> ]

### **Setting up a Coherent Network of Marine Protected Areas**

[ <http://environmentalpillar.ie/environmental-pillar-outline-policy-regarding-the-setting-up-of-a-coherent-network-of-marine-protected-areas/> ]

The Environment Pillar is calling for urgent action to protect and restore marine habitats and biota including fish stocks around Ireland. The Environmental Pillar welcomes the Marine Strategy Framework Directive as one of the key means to achieve this and urges that full timely implementation is now prioritised by government and stakeholders. The Directive provides for a ‘coherent network of Marine Protected Areas’ (MPAs) to be set up - from regional sea (here OSPAR region), over All Ireland, to national and local level. The European Maritime and Fisheries Fund (EMFF) allows funding to be allocated towards this goal. Government and agencies need to:

- Create better fora to facilitate structured dialogue on MPAs, designations, management, monitoring and review. These fora for stakeholders, policy makers,

enforcement agencies and environmental groups need to be appropriate for each MPA network level from international to local and linked.

- Establish a bottom up mechanism for designation of inshore MPAs. Inshore fishermen and other stakeholders need an easily accessible process they can use to put their proposals for MPAs and management measures forward and have them dealt with in a timely fashion. Proposals need to be considered on merit and given reasoned legally enforceable approval, or rejected within set time. An appeal mechanism must be available. Where insufficient information is an issue, the decision may be for further research, with access to funds set out and/or for a pilot MPA.
- Step up research to identify, monitor and understand (potential) MPAs so that a coherent network can be established forthwith. In Ireland with its complex long coast, knowledgeable citizens should be an integral part of inshore MPA research and monitoring, with adequate support.
- Draft and/or implement existing MPA management plans. All current MPAs should have some management by 2015 – at least in regard to protection of known fragile habitats and species, including sea grass beds, biogenic reefs, known fish and shellfish spawning and nursery areas. The piloting of management measures and their enforcement needs to be well recorded and publicized with adequate reporting and feedback mechanisms to learn, improve and adapt, as both our ecosystems and uses are changing.
  - Promote ocean literacy. We need to raise public awareness and first-hand experience of marine ecosystems, as well as understanding of risks and pressures associated with different uses. The goal is to have a high level of informed public participation in decision making and consequently buy in to actions which lead to ‘Good Environmental Status’ of our seas.

## 2.9 Waste as a Resource

- Put in place and enact a National Implementation Plan for the Stockholm Convention. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Adopt a Zero Waste approach to waste management. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]

- Give strong support to the Irish recycling industry. [Environmental Pillar Proposals for the Programme for Government 2011 onwards  
<http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Promote the development of anaerobic digestion of waste streams at community level to deliver combined heat and power and to recycle nutrients to the soils from whence they came. [Creating Sustainable Employment by Greening the Economy]
- Introduce deposit-and-refund schemes on all recyclable food and drinks containers. [Creating Sustainable Employment by Greening the Economy]
- Prioritise the implementation of the Food waste regulations of 2009 and investigate the use of edible foods discarded as waste. [Creating Sustainable Employment by Greening the Economy]
- The Environmental Pillar is opposed to the use of mass burn incineration as a part of the waste management strategy. This opposition is based on the many impacts that incineration will have on the health and well-being of the public, and the damage it will do to the agri-food, tourism, blood-stock and green industries and their capacity to provide jobs and sustainable employment. [Levy on Incineration: letter to Minister Hogan <http://environmentalpillar.ie/levy-on-incineration-letter-to-minister-hogan/> ]
- In the short-term the Pillar asserts the urgent necessity for an incineration levy to recover at least some of the costs, to society and the economy, of the pollutants released in the process. [Levy on Incineration: letter to Minister Hogan <http://environmentalpillar.ie/levy-on-incineration-letter-to-minister-hogan/> ]
- The introduction of the compulsory labelling of packaging to indicate the materials used based on the UK's On Pack Recycled Labelling Scheme. This labelling system should be designed to incentivise producers to ensure maximum recyclability of packaging and encourage development of recyclable alternatives to non-recyclable packaging materials. [Initial Submission on the Proposal to Introduce a Packaging Levy <http://environmentalpillar.ie/initial-submission-on-the-proposal-to-introduce-a-packaging-levy/> ]
- The publication of a list of the known impacts on human health and the environment for all packaging materials used in Ireland. [Initial Submission on the Proposal to Introduce a Packaging Levy <http://environmentalpillar.ie/initial-submission-on-the-proposal-to-introduce-a-packaging-levy/> ]
- The introduction of a packaging levy that aims to minimise the use of packaging, encourages reusable packaging, and differentiates between the following.
  - Unlabelled packaging (highest levy)

- Non-recyclable packaging (High levy)
- Recyclable packaging
- Packaging made from recycled material
- Reusable packaging
- Reusable packaging made from recycled material [Initial Submission on the Proposal to Introduce a Packaging Levy <http://environmentalpillar.ie/initial-submission-on-the-proposal-to-introduce-a-packaging-levy/> ]
- The introduction of complementary deposit and return systems for packaging. [Initial Submission on the Proposal to Introduce a Packaging Levy <http://environmentalpillar.ie/initial-submission-on-the-proposal-to-introduce-a-packaging-levy/> ]
- The revenue from the packaging levy to be used to push Ireland up the waste hierarchy, by stimulating innovation and employment in the reduction, reuse and recycling of packaging. [Initial Submission on the Proposal to Introduce a Packaging Levy <http://environmentalpillar.ie/initial-submission-on-the-proposal-to-introduce-a-packaging-levy/> ]
- The promotion of an EU Directive aimed at developing a harmonised packaging levy based on the above principles and aims. This to be achieved in alliance with Denmark and other Member States, culminating in the publication of a draft directive during the Irish EU presidency. [Initial Submission on the Proposal to Introduce a Packaging Levy <http://environmentalpillar.ie/initial-submission-on-the-proposal-to-introduce-a-packaging-levy/> ]
- Develop closed loop policies for all materials streams, with labour intensive waste resource mining and recycling as a priority. [Creating Sustainable Employment by Greening the Economy]

### **Regional Waste Management Plans**

[ <http://environmentalpillar.ie/environmental-pillar-submission-to-the-public-consultation-on-the-regional-waste-management-plan/> ]

– The Environmental Pillar recommends creating an effective database, the ultimate treatment of waste streams should be properly categorised as 1) reused; 2) recycled; 3) used for thermal treatment; 4) incinerated without energy recovery and 5) landfill. The term recovery which refers to recycling and energy recovery should be discarded as an over-arching definition.

– Proposals:

- The target for waste prevention be increased to 2% per capita per year and funding for prevention activities and public awareness.
- The adoption of a kerbside sorted system of collecting recyclable materials to guarantee a higher quality of feed stock. All households and food businesses must have an additional bio – waste bin for separate collection
- A change in waste policy to move away from incineration/waste to energy as a waste treatment technology and to move towards the adoption of ‘zero waste ‘ principles.
- Development of closed loop policies for all materials streams, with labour intensive recycling as a priority.
- Introduction of deposit-and-refund schemes on all recyclable drinks containers on a pilot basis to test the validity of extending the scheme nationally.
- Prioritisation of the implementation of the Food waste regulations and to investigate the use of surplus edible foods currently discarded as waste.
- Promotion of the development of anaerobic digestion of bio waste streams at community level to deliver combined heat and power and to recycle nutrients to the soils from whence they came.
- The establishment of regional and/or national symbiosis programmes to foster and assist in the development of industrial symbiosis networks.
- Provision of adequate and sufficient funding for local and regional authorities to monitor and enforce proper management and treatment of waste to ensure that the waste hierarchy is properly enshrined in the ultimate use of valuable waste resources.
- Increase of the REFIT rate for anaerobic digestion to encourage the development of this industry and provide government assistance in terms of grants, loans or guarantees.
- Regional authorities investigate possible financing mechanisms through the packaging PRI to fund the management of packaging waste found in street cleanings, litter collections and street bins and to increase the number of separate recycling bins on streets.
- A more bottom – up public awareness and community involvement to assist in behavioural change in how we manage our waste.
- We encourage the regions to increase the amount of money available for local waste prevention programmes, similar to that adopted by Zero Waste Scotland.

## 2.10 Transport

- A Bus Rapid Transport spoke and orbital instead of Metro North should be given serious consideration. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- An end to the use of Public Private Partnerships for borrowings to fund road programme off national balance sheet. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- All currently contracted motorways connecting Dublin with regional cities should be completed. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- No new ‘Motorway’ standard roads should be started or contracted for. Where upgrades are necessary these should be undertaken using 2+ 1 carriageways on existing routes and the provision of bypasses where necessary. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- End all Public Service Obligation subsidies to regional airports. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Do not develop any new ports but instead concentrate on building capacity of existing ports using increased rail freight. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/> ]
- Do not build a second runway at Dublin Airport. [Environmental Pillar Proposals for the Programme for Government 2011 onwards <http://environmentalpillar.ie/environmental-pillar-proposals-for-the-programme-for-government-2011-onwards/>]
- Introduce measures to encourage Rail Freight. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Invest in Rail Electrification. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]

- Prioritise regulatory reform for the transport sector. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Develop a network of tourism-oriented high quality cycle routes to build on the success of the Great Western Greenway and similar routes throughout Europe. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Drop the new major road proposals and use the capital to support public transport and cycling investments. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]

### **Investing in our transport future – A Strategic framework for investment in land transport and its SEA – 16<sup>th</sup> October 2014**

[ <http://environmentalpillar.ie/transport-future/> ]

- A Strategic Framework for Investment in Land Transport must be written in the context of the National policy in relation to transition to a low-carbon economy, reworked from first principles.
- The Framework should be amended to ensure we comply with EU law on air pollution and the Air Quality Directives.
- The repeated reference to the importance of public health as a factor in transport policy must be translated into actions to be included in the framework that are linked to health change indicators.
- Road infrastructure must facilitate and not discourage walking and cycling. The solution is straightforward – build pedestrian and cyclist-oriented settlements with good rail access. This issue should be addressed in the investment framework.
- The document should recognise the importance of green infrastructure approaches to transport infrastructure and commit to a green infrastructure approach [<http://environmentalpillar.ie/briefing-paper-3-position-on-infrastructure-investment/>]
- The Environmental Report should be brought into line with the requirements of the SEA Directive, include qualitative analysis of the impacts of the Framework on emissions and incorporate existing legal obligations and national policy in relation to climate change and air quality.

## **2.11 Tourism**

- Provide support for green tourism projects that enable local communities and businesses, including farmers to diversify and create more sustainable local

economies. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]

- Massively expand CE schemes and Tús scheme in order to benefit built and natural heritage and with follow on tourism benefits. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]
- Pump prime niche tourism with wildlife as a quality offering supporting local nature reserves as attractions for tourism with spin off for local communities. [<http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/>]

## 2.12 Flooding

- The Planning and Development Acts need to be amended to prevent zoning of flood plains. An immediate step that must be taken is to ensure that no development takes place on natural flood plains. [Policy Statement on the Flooding Crisis November 2009 <http://environmentalpillar.ie/policy-statement-on-the-flooding-crisis-november-2009/> ]
- The Land Reclamation Act 1949 must be repealed. Its place should be taken by a Wetland Protection, Restoration and Wise Use Law. [Policy Statement on the Flooding Crisis November 2009 <http://environmentalpillar.ie/policy-statement-on-the-flooding-crisis-november-2009/> ]
- Policies must look at the entire catchment area of watercourses and promote a coordinated framework for the development, management and conservation of water, land and related resources. [Policy Statement on the Flooding Crisis November 2009 <http://environmentalpillar.ie/policy-statement-on-the-flooding-crisis-november-2009/> ]
- The National Climate Change Adaptation Strategy for Ireland must integrate the principles of sustainable flood management. [Policy Statement on the Flooding Crisis November 2009 <http://environmentalpillar.ie/policy-statement-on-the-flooding-crisis-november-2009/> ]
- Local and planning authorities should adopt the ‘precautionary principle’ or approach in respect of flooding when considering planning applications. [Policy Statement on the Flooding Crisis November 2009 <http://environmentalpillar.ie/policy-statement-on-the-flooding-crisis-november-2009/> ]

- County Managers and County Councillors should be held responsible for the damage done to the public and the environment, where respectively they have granted planning permissions and zoned lands contrary to the guidelines on flood plains. [Policy Statement on the Flooding Crisis November 2009 <http://environmentalpillar.ie/policy-statement-on-the-flooding-crisis-november-2009/> ]

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## 2.12 Leader Companies

- Include screening for environmental sustainability and job creation in the green economy in the pre-approval project evaluation by Leader Companies (Integrated Local development Companies). [ <http://environmentalpillar.ie/greening-the-economy-and-creating-sustainable-employment/> ]