

27<sup>th</sup> November 2023

**RE: Draft Cork County Climate Action Plan 2024 – 2029**

To whom it concerns,

Cork Chamber represents 1,200 members together employing 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals five of which have been identified by the Chambers Ireland network.

On behalf of our members, Cork Chamber welcomes the opportunity to contribute to the Draft Cork County Climate Action Plan 2024 – 2029 which is essential to address environmental challenges, contribute to both national and global climate goals, and build a sustainable and resilient community for the future.

It is imperative that this plan is robust and provides businesses with a roadmap for navigating the challenges and opportunities that climate change presents. From a business perspective this action plan has potential to be very positive for the business community and the wider economy and as well as encouraging regulatory compliance that will be associated with the *Corporate Sustainability Reporting Directive*, it has the potential to provide pathways for businesses to various funding streams available to encourage the reduction of emissions in the corporate sector. We have made a number of recommendations and observations that we believe are imperative in the context of this action plan.

We remain at your disposal with any additional insight from our members.

Yours sincerely,



Conor Healy

CEO

## **CITIZEN ENGAGEMENT AND COMMUNITY LEADERSHIP**

All parts of the community need to be involved in the journey towards climate action and feel that they have contributed towards the solutions in order to ensure buy-in. The Limerick Citizen Innovation Lab is a key example of a collaboration hub, funded by Creative Ireland in partnership with the Department of the Environment, Climate and Communications through the Creative Climate Action Fund. This lab, part of the Decarbonising Together project, has put co-creation and civic participation at the heart of Limerick's decarbonisation journey. We recommend a similar approach be taken in Cork's major towns, with lessons learned from Limerick's experience.

It is very positive to see the designation Macroom as Cork County's first Decarbonising Zone. This plan sets out a range of climate mitigation, adaptation and biodiversity measures within this area which will encourage citizen engagement and community leadership.

It is imperative that the Council takes a leading role in climate action. It was positive to see the emissions output of the local authority in this updated draft action plan, and this will foster a collective approach to tackling climate change. This type of proactive approach should be taken through the course of this climate action plan.

## **BIODIVERSITY**

Climate change and biodiversity are interlinked, whereby climate change is driving biodiversity loss and climate action will require action to significantly enhance biodiversity. In a Cork context our forests, peatlands, waterways and ocean habitats play a key role in sequestering carbon. Biodiversity is also intrinsically linked to food production and transitioning to more regenerative systems of agriculture. Ireland has declared a biodiversity crisis, and it is positive to see a focus on this in the draft action plan.

Biodiversity has intrinsic value that cannot be easily quantified yet its presence is felt in every sector of society. From a Cork point of view, the richness and diversity of its biodiversity is the lifeblood of Cork and fundamental to the quality of life of all citizens. With the current biodiversity crisis, every action must be taken to enhance and protect this natural fabric that increases the resilience of our communities, the appeal and attractiveness of Cork to investment, and the reputation of Cork in attracting and retaining skills and talent. The promotion and enhancement of heritage and biodiversity is essential to the DNA of Cork.

## **ECONOMY**

### **Enterprise and Tourism**

It is very positive to see a focus on tourism in this plan as it is an area of huge economic benefit for the entire region and plays a key role in the local economy. Those in the sector must be supported in the green transition needed to sustain the sector and secure its future. It is very positive to see a focus on education and the delivery of green skills as well as pathways to accessing funding to help with the installation of equipment needed to ensure energy efficiency.

It is very important that Cork is viewed as a sustainable tourism destination, however while the actions of this plan include a focus on zero/low carbon models of transporting goods in Cork County, there must be a greater emphasis on low carbon ways to transport people, particularly those visiting and holidaying in the county. Frequent, reliable and cost-effective transport options are needed to encourage those visiting to travel sustainably.

Minimising the impact of the hospitality sector must be a vital element of this plan. Encouraging hotels and accommodation to adopt eco-friendly practices will be key to reducing the carbon footprint of this sector. In this regard, the introduction of a sustainable tourism certification would encourage businesses operating within the tourism industry to strive for greener standards and this encourage a commitment to responsible practices.

### **Climate Action in Economic Plans and its promotion to enterprises in Cork County**

A more holistic approach is needed to embed climate action in all economic planning. While support for European and national programmes such as LEADER are essential, it is vital that awareness is raised of these programmes to ensure that enterprises will benefit from them.

While it is positive this plan places a focus on supporting climate action implementation in collaboration with partners and assisting rural enterprises in their bid to transition to a low carbon model, a clearer understanding of this should be mapped out. How will collaboration with partners be fostered and how will rural enterprises be fully supported in the green transition. It would be very beneficial to the success of this action plan to see this planning mapped out in real terms.

Partnerships across private sector, public sector, and academia should be formed to ensure plans are robust and implementable as seen across Danish Municipalities Climate Action Plans. The climate crisis is not bound by local authorities so the solutions cannot be either<sup>1</sup>.

### **The operation and development of remote work hubs in the County**

Since the foundation of the Ludgate Hub in Skibbereen, the benefits of remote working have been well documented from a climate perspective. Many people living in the county commute to and from the city every day for work. Remote working hubs provide an alternative to this requirement 5 days a week. It is extremely important that this climate action plan promotes the development of remote working hubs, which also a huge boost to the area they are located in. Developing new remote working hubs in Cobh, Mitchelstown and Newmarket will be of huge benefit to both the city and county reducing congestion and adding vibrancy to county towns. The planned development of these three new hubs should be a minimum baseline for new development over the course of this plan with the potential for them being explored in other county towns.

It is vital that this plan also encourages enterprises to work in collaboration with remote working hubs which would foster good relationships and connections between city and county as well as reducing the daily commute for many people.

## **AGRICULTURE**

Agriculture accounts for 39% of all greenhouse gases in the county, as per this draft plan and is the sector with the highest emissions, at the same time it is also a key part of rural Ireland. Therefore, protecting agriculture in rural Ireland, and indeed in County Cork, is essential for economic stability, cultural heritage, food security, environmental sustainability, and the overall well-being of the communities in the county that are associated with agriculture. Efforts to assist the agricultural community in attaining the emission standards that can protect the environment must also support and sustain agriculture.

It is therefore very welcome to see a great focus on educational efforts targeted at both farmers and the public, such as the routine maintenance of septic tanks, the use of pesticides, and the best

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<sup>1</sup> <https://www.c40.org/news/first-dk2020-cap-launch/>

practices around spreading slurry. The promotion of local food is of huge importance, and this plan should include a goal to see the development of farmers markets within every local town to reduce food miles and promote and support local produce.

Working in partnership with farmers will be essential to reducing emissions, protecting biodiversity and ensuring environmental protection requirements are being met. It is essential that the necessary supports are in place to assist farmers on this journey, and consultation with the farming community will be key to ensuring a more sustainable future for the farming community and farming enterprises.

It is also very important to see a focus on water, biodiversity and the protection of public health in relation to water. By safeguarding these vital elements, communities can enhance their resilience, protect natural resources, and contribute to the county's efforts to combat climate change. Climate-related events, such as extreme weather and rising temperatures, must be taken into account when considering the impact water quality. We have witnessed severe flooding in recent months, and unless drastic action is taken to prevent climate change these severe weather events will become more common. It is therefore very important that this climate action plan places a focus on water quality which can directly impact public health through water contamination and scarcity. Healthy water ecosystems are very important also in this regard as they can provide vital ecosystem services, including water purification, flood regulation, and habitat support for diverse species.

## **ANAEROBIC DIGESTION**

It is essential that the agri-food industry and farmers are supported to transition to more sustainable low-carbon practices. A number of opportunities exist for farmers to begin this transition.

Mobilising Cork's anaerobic digestion resources, while ensuring principles of sustainability and circularity with regards to feedstock selection, is an obvious solution to enhancing the industry's sustainability, reducing GHG emissions, providing an additional source of revenue to farmers, while decarbonising industrial heat and transport.

The immense value of creating better and more sustainable organic fertilizers in the form of digestate further illuminates the potential awaiting the nation in transitioning to a circular bioeconomy. By utilising and capitalising on currently under-utilised and often wasted resources, Cork can make its mark globally as a leader in the bioeconomy. Please see Cork Chamber's Anaerobic Digestion report, which extensively deals with this topic<sup>2</sup>.

### **Regenerative Agriculture**

Regenerative agriculture, which goes a step beyond sustainability and reducing emissions, takes a holistic approach focusing on strengthening the health of the ecological system as a whole. Regenerative agriculture has five main principles: improving soil health, increasing biodiversity, carbon sequestration, humane treatment of livestock and farmworkers, and improving the overall ecosystem. By focusing on soil health, biodiversity, and incorporating a polyculture in agricultural practices, fewer inputs including fertiliser are required.

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<sup>2</sup> [https://www.corkchamber.ie/wp-content/uploads/2022/03/10793-Anaerobic-Digestion-report\\_final.pdf](https://www.corkchamber.ie/wp-content/uploads/2022/03/10793-Anaerobic-Digestion-report_final.pdf)

A number of policy, legislative, financial and behavioural barriers exist, delaying the uptake of such practices. Partnering with organisations such as Teagasc to carry out communication and information campaigns and create programmes to engage the agri-food industry in Cork would be beneficial towards supporting the industry in their transition.

## **TRANSPORTATION**

Car dependency in Cork needs to be tackled in order to reduce greenhouse gas emissions. The actions within the County Climate Action Plan to facilitate more sustainable modes of travel are welcomed by Cork Chamber. We have further advice and recommendations that we ask to be considered in the development of this plan.

Clear modal share targets that align with the County Development Plan, Climate Action Plan and EV Network Plan need to be devised for all public transport modes, active travel and Electric Vehicles (EV).

Behavioural change will be key to facilitating a modal shift to active and public transport and the use of EVs, as noted within the draft plan. It is vitally important that commuters have confidence in the public transport network. A low percentage of our members and their employees use the bus system because it currently does not meet their needs. Reliable services by keeping them resilient to heavy general traffic conditions is the primary condition to make the new bus system attractive and to achieve the modal shift away from private car traffic that is urgently needed.

The recent announcements from Iarnód Éireann to switch to an electric and battery-electric train fleet for the Cork Commuter rail network is an important step towards a transformed public transport offering in Cork. In order for this plan to achieve emissions reductions by 2030, the enabling works must be carried out at pace. It is even more important now that the necessary funds already secured for these enabling works are allocated to Cork by the end of this year. These works need to be completed by the end of 2025 so that new electric trains arriving in Ireland can run on Cork's suburban lines.

It is crucial that progressing the suburban rail system in Cork is included in this plan. The recent enhancement in the suburban rail offering, including fare reductions and increased frequency have resulted in a significant increase in passenger use. The suburban rail services and new stations contained within the Cork Metropolitan Area Transport Strategy must be delivered at an accelerated rate.

Full integration of all public transport and active travel modes is needed to maximise coherence, including interurban services, LocalLink services, rail services, the best use of interchange hubs with Park and Ride/Stride and active travel (walking and cycling) to enable the highest volumes switching to travel sustainably, including public bike-sharing and car-sharing, in planning, ticketing, information and communication design is essential.

There should be specific actions regarding different cohorts' use of public transport. For example, there is ample opportunity to address car use and congestion associated with the school run. Support for local initiatives such as the Cycle Bus , #andshecycles campaign , and other Green Schools projects should be included in this plan. More students travelling to school independently using public transport, walking and cycling can enable the reduction of local car use and traffic.

Sustainable logistics and the movement of goods in and out of rural villages and towns must be considered in this plan. The opportunity to develop Ireland's freight network is significant and we strongly advise that Marino Point in the Port of Cork be considered as a location for the development

of rail-based port freight transport infrastructure, in alignment with the Cork County Development Plan 2022-2028 and the Port of Cork's Masterplan 2050, which are both pivotal to the strategic development of the Port and the Cork region.

## **BUILT ENVIRONMENT**

### **Renewable Energy**

Ports are essential enablers for the development of the Offshore Renewable Energy (ORE) industry, supporting the supply chain, forming industrial clusters and meeting national targets. Currently, Belfast is the only port on the Island of Ireland fully ready to service offshore wind farms. Ports across Ireland, including Cork, have or are preparing operational plans and new facilities to serve the ORE sector. Proactive port investment and clarity in relation to funding must be provided for these projects.

With its unique position as the world's second-largest natural harbour, the Port of Cork has a key role to play in Ireland's offshore wind and hydrogen industry and in its ability to meet its 2030 targets. Investment in the Port must be delivered to capture this potential.

Cork County Council's plans to establish a governance structure to drive the development of renewable energy is a positive step from the council. However, a joined-up approach to ORE development is the only way we will most effectively drive the development of the sector. It is essential that all stakeholders, including Cork City Council and Cork Chamber, are included in this taskforce. While a portion of the infrastructure and associated activities will be developed in the county e.g., wind farms, assembly, operations and maintenance, there will also be economic activities associated with ORE in the city bounds via the service sector that is built up around wind energy.

### **Energy Efficiency**

Enhancing the energy efficiency of the build environment faces numerous challenges for both residential and commercial buildings, with financial barriers among the top obstacles. To date, the majority of supports for retrofitting have been aimed at residential homes. While these supports are vital, there is an increasing need for focus on retrofit of existing commercial buildings, particularly those occupied by SMEs which often suffer from split incentives, and with a move by large multinational companies to new office buildings that meet new sustainability requirements. A clear focus and an incentive package is required to retrofit and decarbonise our existing commercial building stock.

To overcome financial barriers to retrofitting and energy efficiency we recommend the following:

- Introduce measures to incentivise both private individuals and the private business sector to invest in green properties. Some suggested measures in this regard include additional 'green' tax reliefs in respect of Capital Gains Tax liabilities arising on the disposal of properties that have been retrofitted.
- Encourage a regional approach on financial retrofitting initiatives by fostering partnerships between local authorities and the financial sector, drawing inspiration from the effective strategies adopted in Parma and Melbourne .
- Explore the implementation of Environmental Service Agreements, which link tax incentives to the progress made by local authorities in their endeavours to decarbonise buildings within the region.

- Create a regional task force focused on local retrofitting, bringing together representatives from the public, private, and financial sectors to encourage cooperation among stakeholders and lead the efforts in decarbonising the built environment.

### **Flood Relief Schemes**

The last month has clearly portrayed the urgency to prioritise climate adaptation as Storm Babet severely impacted the county. Cork Chamber urges that the various flood relief schemes planned throughout the county be implemented without delay.