

Fitzgerald House, Summerhill North, Cork, T23 TD90, Ireland. +353 (0)21 450 9044 info@corkchamber.ie CorkChamber.ie

Climate Action Plan Coordination and Delivery Unit,
Department of Climate, Environment and Energy,
Tom Johnson House,
Haddington Road,
Dublin
D04 K7X4.

4th June 2025

To whom it concerns,

Cork Chamber welcomes the opportunity to provide feedback to the Department of Climate, Environment and Energy's consultation on Carbon Budgets.

Cork Chamber represents 1,200 members together employing 130,000 people throughout the city, metropolitan area and county. Our vision is to lead a transforming and ambitious Cork City and County, and our purpose is to unite, represent and support our members and community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of the Climate, Environment and Energy for 2024 – 2025.

Cork Chamber's advocacy efforts are guided by the views and priorities of our partners, and are shaped by our continuous engagement with members, our Board and key stakeholders in Cork City and County. As an SDG Champion, all of our activities and outputs are rooted in sustainable principles. Cork has also been awarded the EU climate-neutral and smart cities mission label, and we are committed to supporting the achievement of Cork's climate targets to 2030 and beyond.

Ambitious climate targets for 2030, 2040 and 2050 have been set at national and EU levels. While the Government is working towards these targets, recent findings suggest the achievement of these goals may be under threat. An assessment by the European Commission found recently that Ireland is on track to reduce its emissions by 25.4% by 2030, significantly lower than the legally binding target of 42% which has been set by the European Commission.<sup>1</sup>

Cork Chamber recognises the urgency of addressing the climate crisis and we support the principle of science-based, ambitious carbon budgets in line with Ireland's national and European climate targets. While we are not in a position to comment on the specific calculations underpinning the proposed carbon budgets, Cork Chamber's response draws on



<sup>&</sup>lt;sup>1</sup> The Irish Times, Ireland's energy and climate plan far from sufficient, EU Commission finds

our established policy positions, member engagement, and strategic priorities in supporting a just and effective climate transition.

In the coming years, it is critical that we step up our climate mitigation efforts to ensure that we meet these binding targets to avoid considerable financial penalties at European level, as well as the potentially irreversible and catastrophic climate implications. Our carbon budgets play an important role in this regard, setting out a pathway for Ireland to achieve a climate neutral society before 2050.

Research conducted by University College Cork and Cork City Council in 2023 found that the two most significant sources of greenhouse gas emissions in Cork city were home energy usage and road transport.<sup>2</sup> Industrial and commercial buildings are the next most significant contributor to emissions in the city. Therefore, it is vital that we concentrate our climate change mitigation and decarbonisation efforts on these emission-heavy sectors, with targeted supports, resources and funding.

As part of Cork's progress towards climate neutrality by 2030, Cork City Council is undertaking a number of projects under the EU climate-neutral and smart cities mission and Cork Chamber is proud to support a number of these initiatives. Cork Chamber is working alongside Cork City Council to help identify and progress large-scale decarbonisation projects taking place within the city. Undertaking projects that transform our existing building stock, alongside strategic actions to pursue the electrification of our transport system, will have a transformative impact on the city's carbon footprint by addressing some of the most significant contributors to emissions in the city.

From a business perspective, it is vital that sufficient resources and supports are provided to enable firms of all sizes to pursue decarbonisation and sustainability goals. Initiatives like the EU mission cities project can help provide advice, guidance and funding to businesses seeking to invest in more sustainable business practices and operations. While large-scale decarbonisation projects are often prioritised because of the significant impact they can have on emissions reductions, it is critical that SMEs are also supported in their climate journeys.

Cork Chamber also supports Cork City Council's Local Green Deals programme, which facilitates the development of tailored sustainability action plans at local level, enabling smaller organisations to undertake impactful climate actions locally. Cork Chamber has assisted a number of organisations in developing Local Green Deals and signed its own Local Green Deal in February 2025.<sup>3</sup> Initiatives like these can provide SMEs and community organisations with practical, achievable actions to undertake in pursuit of sustainability and energy efficiency.

<sup>&</sup>lt;sup>2</sup> University College Cork, <u>UCC research reveals where Cork's greenhouse gasses are being generated</u>

<sup>&</sup>lt;sup>3</sup> Cork City Council, Wheeling and Dealing – Cork City Council agrees Local Green Deals

The proposed carbon budgets will have significant implications for businesses, particularly SMEs and energy-intensive sectors. It is vital that such businesses are supported with clear and timely communications regarding sectoral emissions ceilings. Additional supports for SMEs should be considered, including access to finance for energy upgrades, digital tools and training or upskilling programmes, concentrating in particular on sectors most affected by changes to ensure a just transition. This is particularly important from a regional perspective to ensure balanced decarbonisation around the country.

In the last quarter of 2024, Cork Chamber carried out an Economic Trends survey among members, asking about their experiences of implementing energy efficiency measures. The survey findings indicated that access to grant supports was the single most valuable resource to enable more efficient practices in businesses. A large number of respondents also cited advice regarding funding access and other practical measures as an important resource to enable more efficiency. 42% of responding businesses stated that they were very likely to implement energy efficiency measures over the course of 2025.<sup>4</sup>

It is clear that many businesses are attuned to the importance of improving energy efficiency in their practices and operations, and are committed to pursuing measures that can improve their efficiency, from changes in waste management practices to large-scale retrofitting upgrades. However, many firms, particularly SMEs, would benefit from additional supports and resources to assist with this. Improved communications regarding the availability of grants and advice on how best to implement more sustainable practices would also be beneficial for many.

Work with businesses at local and regional level is vital to support the achievement of national climate targets, however this must happen in tandem with investments and support for the energy transition at a national level. Investing in our renewable energy capabilities is vital to future-proof and secure the Irish economy, reducing emissions while also providing for energy security and independence, all of which plays an important role in enhancing Ireland's competitiveness.

In 2024, Cork Chamber established the Cork Offshore Renewable Industry Forum (CORIF) to bring together industry representatives of the offshore renewables industry in Cork to advocate for the key policy and infrastructure enablers that will support Cork's development as a renewable energy hub. The Port of Cork has commenced a significant upgrade to facilitate offshore renewable energy in the region, and Cork is already home to many of the key industry actors in this space, as well as significant educational and research institutions, such as the National Maritime College of Ireland (NMCI) and the MaREI Centre. The upcoming auction for the first of the South Coast Designated Maritime Area Plan (SC-DMAP) sites, Tonn Nua, in the autumn will represent a further milestone for the development of offshore renewables in the region.

.

<sup>&</sup>lt;sup>4</sup> Cork Chamber, Economic Trends Quarter 4 2024

It is vital that Cork's potential in this regard is leveraged fully, and that clear policies and a route to market for the additional SC-DMAP sites are established as soon as possible to allow the development of offshore renewables off the south coast to progress, particularly as work on the National DMAP is not expected to be completed before the end of 2027. Without swift action from Government, potential investments may be lost to other jurisdictions.

EirGrid and others have also commenced work to provide for the grid upgrades and connections that will be required to harness the potential of the SC-DMAP through programmes such as Powering Up Offshore South Coast. It is critical that continued supports are provided to enhance Ireland's grid and supporting infrastructure to ensure that Ireland is sufficiently prepared for the green transition.

Carbon budgets must be aligned with planning for renewable energy developments. Such developments must be accelerated where possible, through for example the timely delivery of the initial Phase One offshore wind projects in the coming years, to ensure that Ireland does not fall short of its ambitious climate targets for 2030 and beyond.

The harsh effects of climate change are already becoming apparent in many regions around the world. Here in Cork, the impact of more severe weather events has become clear in recent years. Increases in the frequency and severity of flooding incidents in particular have had a devastating impact on Cork City and towns in County Cork, and it is critical that flood defences and related supports for affected businesses and communities are prioritised by Government alongside its climate objectives.

In summary, it is crucial that all Government Departments, local authorities, state and semistate agencies, and other key stakeholders continue to engage and cooperate on all aspects of the green transition. Addressing and mitigating the effects of climate change demands coordinated, meaningful action and we look forward to ongoing engagement in pursuit of Cork's goals as an EU climate-neutral and smart cities mission participant to 2030 and beyond.

Yours sincerely,

Cathal McSweeney

fdunc-

Director of Public and International Affairs