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**CLARE PUBLIC PARTICIPATION NETWORK/CLARE ENVIRONMENTAL NETWORK
SUBMISSION TO CLARE COUNTY COUNCIL IN RESPECT OF THE DRAFT CLIMATE
AND BIODIVERSITY EMERGENCY ADAPTATION STRATEGY 2019-2024.**

For the attention of:

Director of Services, Physical Development Directorate, Clare County Council, New Road,
Ennis, Co. Clare

August 7th 2019

Clare PPN is a network of 294 community, voluntary, environmental and social inclusion groups from Clare. It exists to facilitate the formal participation by the community sector in Clare County Council's decision making structures. It is funded jointly by the Department of Rural and Community Development and Clare County Council but is autonomous and its activities are directed by its members through an elected secretariat. Clare PPN's website is www.clareppn.ie and we are on twitter [@clare_ppn](https://twitter.com/clare_ppn) and <https://facebook.com/clareppn/>

Clare Environmental Network is both a member group of Clare PPN and a network of environmental groups, individuals and organisations in the County. It exists to facilitate those working on diverse aspects of Climate and Biodiversity Emergency mitigation, environmental sustainability, biodiversity enhancement, sustainable farming and tourism to communicate and collaborate with each other.

Clare PPN hosted a consultation workshop on July 29th 2019 in relation to Clare County Council's Draft Climate Change Adaptation Strategy and this submission is the result of that workshop. The workshop was attended by 39 people representing 27 different environmental groups. Please see appendix 2 for details.

We welcome this opportunity to provide input on the Draft Climate and Biodiversity Emergency Adaptation Strategy (DCCAS). Our workshop participants wish to have it noted that they would have preferred to be consulted prior to the drafting of the strategy and to

have had the opportunity to attend workshops with the team responsible for the strategy. It should also be noted that the rights of citizens to 'Public Participation' on environmental issues is mandated under the Aarhus Convention Directive 2003/35/EC/. Clare PPN notes that each suggestion in this submission relates to one of the Sustainable Development Goals which Ireland has adopted. Please see Appendix 1 for link to Ireland's Sustainable Development Goals Implementation Plan 2018- 2020 which is government policy.

General input from our workshop:

Clare PPN welcomes the commitment given by Clare Co. Co. to support the implementation of The Paris Agreement which seeks to limit global warming to less than 2°C. It was noted by our workshop participants however that the goals of The Paris Agreement are not in themselves sufficiently ambitious to keep temperature increases below 2°C (as cited in Mary Robinson's Climate Justice book) and that the Current IPCC] report states that temperature rises above this level are devastating to the life support systems of the planet. This submission includes elements which seek to mitigate the climate and biodiversity crisis as well as those which fall under the heading of climate adaptation, and our workshop attendees wished to stress that adaptation and resilience will require mitigation actions and so many of these suggestions are necessary for any thorough adaptation strategy.

Whilst the practicality and clarity of this document was commended by many attendees there was general consensus that it was weaker on the necessity of community involvement – particularly in emergency situations and on the behaviour change aspects which will be required of communities, business interests, planners and state agencies in order for Clare to prepare adequately for the years ahead. Clare PPN recognises that not all of the above is within the remit of Clare County Council however many elements of the necessary changes will fall within the remit of Local Authorities and we call on Clare Co. Co. to be ambitious and to recognise the urgency which faces us.

Clare PPN would like to request on behalf of those consulted that the following actions are taken:

1. Declare and use the term Climate and Biodiversity Emergency: Our environmental member groups, Clare Environmental Network and the individuals who attended our focus group are concerned that the DCCAS and its provisions and actions while welcome do not appreciate or adequately prepare for the seriousness of the situation we are in. Clare PPN calls on Clare County Council, to declare a climate emergency and to use that wording in this strategy rather than climate change as is currently prevalent in the document.
2. Biodiversity – include in the strategy a definition of biodiversity and ensure that where it is referenced a full understanding of the importance of biodiversity for human existence and sustaining life is taken into consideration- Clare PPN recommends that at point 4.2 Climate Hazard Impacts and Consequences that a seventh theme be added to the existing list 'Theme Seven Protecting Biodiversity, Ending Extinctions and Ensuring Food Security'
3. Clare PPN requests that a biodiversity officer be appointed in a full time permanent role to ensure that awareness of the importance of protecting biodiversity is

mainstreamed and incorporated into all policies and actions and that they are available to provide training and research on the subject.

4. Clare PPN calls for the establishment of a Climate Change and Biodiversity Strategic Policy Committee to oversee this strategy and to advise on environmental sustainability issues in general. This has been recommended in the Climate Action Plan from the Department of Communications, Climate Action and the Environment published on June 17th 2019
5. Clare PPN notes the success of the Shannon Green infrastructure Plan 2012/13 and recommends that similar such plans be devised for each significant settlement in Clare. This would compliment ongoing work such as the Town Teams, and Community Plans organised by Clare Local Development Company and Rural Development Strategy of Clare County Council itself. Clare PPN also notes the great effort by Kilrush Tidy Towns in creating their own Sustainability Plan <https://kilrushtidytowns.ie/our-plan/>
6. Clare PPN requests that inventories of the following be compiled and published as a basis for further action and that a commitment to doing so be listed as an action in the CCAS to be completed in the short term.
 - Peat, bog and wet lands in Clare with details of their ownership and condition. We note that a wetland survey exists from 2008 and recommend that this be updated. (<https://www.clarecoco.ie/services/arts-recreation/publications/county-clare-wetland-survey-2008-11882.pdf>)
 - All Council owned land in Clare and its status and capacity to contribute to green infrastructure, carbon sequestration, enhancement of biodiversity, food security, and renewable energy production.
 - All 'brown-field' sites in Clare either in direct or private ownership with a view to establishing if any such sites are suitable for any of the above in particular Solar PV, Energy Farms or Wind Farms.
 - An inventory of trees in County Clare, in particular, mature deciduous trees and native species following which a tree protection and planting strategy for the county can be developed.
 - An inventory of historic and cultural sites and an assessment of risk to them from Climate and Biodiversity Emergency.
7. Clare PPN notes that one of the earliest and most local effects of the Climate and Biodiversity Emergency on any community affected is poverty. Clare PPN recommends that this is detailed in DCCAS and that measures and supports and resources are planned in advance for communities likely to be affected by such events as flood, drought, loss of land etc.

Following discussion of the draft document the groups attending our workshop wished also to provide their input to the strategy **under the following seven headings** which captured all concerns and recommendations for amendments to the DCCAS. Those attending the workshop recognise that some of these do not relate directly to the content of the *current draft strategy* but as they were not engaged in the process at an earlier stage they are taking this opportunity to seek their inclusion:

1. Energy

2. Biodiversity and Soil Health
3. Air Pollution and Waste
4. Community Resilience, Health and Well Being, Awareness Raising and Education
5. Water Quality, Flooding and Marine
6. Travel, Transport and Housing
7. Food Security, Production and Land Use

Our attendees wished to draw the adaptation team's attention to a range of practical and achievable actions that can be taken in Clare which will contribute towards successful adaptation to, and continued mitigation of the climate catastrophe. They would like to see as many of these as possible incorporated into this five-year Climate Change Adaptation Strategy.

1. Energy *NB please see under the Travel, Transport & Housing heading for transport related recommendations on energy use.*

- a) No new fossil fuel infrastructure should be developed and Clare County Council should object to the proposed Shannon LNG terminal in the Shannon Estuary. SDG 7,13
- b) DCCAS should commit Clare Co. Co. to ensuring that all future energy infrastructure avoids dependence on imported resources in order to ensure resilience to local or global threats and events -economic, political or natural. SDG 7,8,9,13
- c) DCCAS should commit Clare Co. Co. to encourage community micro energy generation with community ownership of renewables projects especially in rural areas. SDG 7,8
- d) DCCAS should include a commitment to ensuring that remote working becomes more feasible, this action can build on from the availability of digital hubs in each municipal district. Remote working can reduce energy consumption and also help to prevent rural communities becoming dormitory towns for industrial centres. Access to fast broadband in rural areas should remain a priority for rural development and its capacity to enhance the sustainability of rural communities should be noted in the DCCAS. SDG 8,11
- e) DCCAS should include firm plans for how Clare Co. Co. can support workers in fossil fuel industries in a just transition to sustainable livelihoods. We note this with particular reference to Moneypoint which must cease burning fossil fuels and call on the Council to use all the resources at its disposal to support the community and workers in planning and establishing alternative enterprises. SDG 7,8,9,13
- f) Clare Co. Co. should plan for and ensure that proper use of substations and decentralised energy generation is made to avoid loss in energy transport. SDG 7, 12
- g) Investment- Clare Co. Co. should seek funding for retrofitting houses, businesses, Council and public buildings. Clare Co. Co. should aim to support and organise providers for apprenticeships and training programmes in retrofitting and solar panel fitting and testing to ensure that communities who experience high unemployment in Clare may benefit from any economic opportunities. SDG 4,8,7,9

- h) DCCAS should include commitments to research and pilot the possibilities for expanding anaerobic digestion technology as detailed in the Clare Renewable Energy Strategy 2017 -2023. SDG 7,8, 12
- i) DCCAS should commit to early and extensive public and direct community consultation on wind and wave energy products both of which our attendees considered vital to a transition towards renewables based energy consumption. SDG 12,7,9,8
- j) DCCAS should include a requirement for any industrial planning applications, in particular energy-heavy data centres to demonstrate their capacity to operate on a carbon neutral basis and to provide for their own renewable energy needs from wind or solar energy options rather than drawing from the national grid. Applications should also include provisions for the secondary use of heat generated by data centres in other applications. This requires strategic planning, considerations of infrastructure required for the use of secondary heat resources and access to the likely consumers. Our attendees suggested that a mandated and monitored native forest planting as a condition of all such permitted industrial sites would assist in carbon sequestration as well as ensuring amenity value into the future. SDG 9,7,11,12
- k) DCCAS should pay more considered attention to awareness raising, educational initiatives and community participation. Widespread education initiatives are necessary on energy efficiency and eliminating energy waste, with involvement from Clare Co. Co.'s environment officer and other relevant bodies. Clare PPN notes that it (Clare PPN) is listed at G6 No 1. pg 60 a means of raising awareness of Community response to Climate and Biodiversity Emergency and requests that when our cooperation is envisaged that we be consulted on our inclusion. Clare PPN was not consulted or notified in advance of this strategy being drafted although we wish to indicate our willingness to participate in working collaboratively on adaptation and mitigation actions in the county. SDG 4,12,7,8
- l) DCCAS should include a commitment to expand the use of willow wetland sewage systems where this is feasible with a view to biomass production aimed at replacing more carbon heavy fuels for heating and other purposes. SDG 7,8,9,12

2. Biodiversity and Soil Health

- a) DCCAS should commit to sourcing and securing sufficient funding for “Seedsavers” Ireland’s National Seed Bank to operate sustainably and without fear for its future. Seedsavers should be viewed as a national resource and biodiversity asset as well as part of our natural heritage. SDG 8,9,12
- b) The organisation CELT – (Centre for Environmental Living and Training) should be supported in its environmental training initiatives both through funding and through use of the organisation by Clare Co. Co. itself especially training in sustainable woodlands and agroforestry. SDG 4,12,11,9,8,15
- c) Glyphosates and other use of Non-Organic Sprays/Pesticides/Herbicides should be prohibited and replaced with sustainable methods and an awareness raising programme. DCCAS should at least include a recommendation to this effect. SDG 15, 12,11,2

- d) DCCAS should indicate that Clare Co. Co. is willing to introduce bylaws where necessary to reduce sewage and slurry pollution with particular attention to that which may include antibiotics, chemicals and pharmaceuticals. SDG 14,6,9,3
- e) DCCAS should outline a strategy to incentivise farmers and land owners regarding allowing wildflowers and weeds to grow and to know the benefits of doing so. As noted elsewhere this can be part of complimentary green infrastructure projects which may assist farmers in securing a diversified and environmentally sustainable livelihood. SDG 8,15,12,11,2
- f) DCCAS should prioritising regenerative agriculture (See food security and land use headings for examples.) SDG 2,12.15
- g) DCCAS should include awareness raising and support for rare breed herds to increase biodiversity and also for a gradual replacement by traditional mixed use breeds of cattle of the specialist beef or dairy breeds. SDG 4,15,12,11,3
- h) Compensate for loss of biodiversity through road development and housing by planting more native trees in available council land – or any available land. SDG 15,12
- i) DCCAS should steer forestry policy in the county away from dependence on mono cultures such as Sitka Spruce and promote the growth of native mixed woodland where ever possible. SDG 15,12
- j) Clare County Council should affiliate to the All-Ireland Pollinator Plan and this should be included as an action in DCCAS which should also indicate that it will encourage wildlife corridors including hedgerows in all developments and area plans. SDG 15,11,
- k) DCCAS should commit to encouraging diversification of farming towards sustainable practices which can assist farmers and rural communities to achieving good livelihoods in Clare – supports, training, and grant aiding sustainable agriculture start-ups or change of use will be necessary. SDG 15,8,9,11,4
- l) DCCAS should seek to ban Ecocide in Clare- this is the deliberate destruction of the natural environment, the provision should include the activities of the local authority as well as community and business interests in Clare. The possibility of a byelaw being enacted should be investigated. SDG 11
- m) CEN/CPPN request that DCCAS should commit Clare County Council to ‘Rewilding’ a % of council ground/hedgerows or idle land. SDG 15,11
- n) DCCAS should include commitments that the timing of hedgerow cutting will be scheduled by the local authority to have the lowest impact on nesting and biodiversity. SDG15,11
- o) DCCAS should include a commitment to respect and implement soil protection and regeneration measures in all its planned developments and to encourage and support such measures in the wider community. SDG 15,11
- p) DCCAS should include a commitment for Clare County Council not to approve plans that include risks of soil damage or contamination. SDG 15,11
- q) DCCAS should include a commitment to use qualified tree surgeons to prune or manage trees on public land. This is another area which might be suitable for apprenticeships and sustainable job creation opportunities. A commitment to organise and run training programmes in hedgerow management should also be included. SDG 15,11,8,4

- r) DCCAS should include a commitment to education, incentive and finally sanctions regarding plastic waste including the pollution of trees/hedgerows by farmer plastics such as silage packaging. SDG 4,11,8
- s) DCCAS should include a commitment to ensure that all publicly used locations in the county have segregate waste bins available and managed by Clare Co. Co.. SDG 12
- t) DCCAS should include commitments to reinvigorate the reputation of County Clare as a 'bio' and slow food production region. This would help to promote sustainable farming methods, lifestyles and attract high value tourism to the region. Community and private enterprises such as Moy Farm, Seedsavers, Wild Foods, and various restaurants, cafes and farmer's markets are already engaged in this effort and so supporting them through promotion and opportunity would deliver a tangible benefit for all. SDG 4,8,11,15

3. Air Pollution and Waste

- a) DCCAS should include a commitment regarding Moneypoint to prioritise immediately a just transition for the workers. SDG 8,4,11
- b) DCCAS should include a commitment to require Moneypoint to immediately cease coal burning. SDG 8,11
- c) DCCAS should include provisions for objections and input to plans in neighbouring areas where there is likely to be a detrimental effect in Clare. EG Irish Cement. SDG 7,9,11
- d) Increase public transport to reduce use of cars – strategic routes i.e. Kilrush to Limerick SDG 11,3
- e) Shannon Airport should be restricted to civilian flights only. War is a chief contributor to CO2 emissions and in particular the US Military is the largest institutional consumer of oil in the world. DCCAS should commit to sourcing other forms of funding for Shannon Airport as a strategic transport asset in the region and should be cognisant of the fact that continued extensive military use of the airport impacts on Ireland's carbon emissions and our subsequent obligatory purchase of carbon credits at a cost to the tax payer. SDG 11,12,3
- f) DCCAS should introduce proper transparent measures to monitor air quality and report publicly on this on a 6-monthly basis. SDG 3,11
- g) It was noted that the existing 'bike to work' scheme should be extended to include electric bicycles and other transport technologies which would reduce the use of privately owned cars. Whilst this is a national programme our focus group members saw opportunities for this to be piloted at a local level. SDG 3,11
- h) Take waste services back into direct operation by Local Authorities – *it should be noted that whilst this option was suggested by several people at our workshop the opposing view was also put forward by one individual who wished to see the current system with private operators properly regulated and with suppliers tendering for complete 'routes' rather than the current situation of several companies collecting in one area. SDG 12,11,9,
- i) DCCAS should undertake to call for a Clare-specific report on "how waste is currently being disposed of" by private operators and by the authority itself. This report would demonstrate if opportunities exist to repurpose, recycle and

minimise waste in County Clare and whether Clare Co. Co. can create the conditions for this to happen. SDG 12,11,9,8

- j) DCCAS should include a commitment to begin providing and publicising and training in the use of public composting zones on public land. SDG 8,11,3
- k) DCCAS should include provisions for an awareness campaign about how to legally dump large items. SDG 4,9,11,3
- l) Bi-annual large waste removal service should be introduced or continued by the local authority. SDG 9,11,3
- m) DCCAS should include a commitment to make regular provisions for the collection and safe disposal of small chemical waste and publicise these collection days so that people know they will occur. SDG 11,3
- n) Should introduce supports for low Income large/chemical waste disposal. SDG 11,3
- o) DCCAS should include commitments to Zero Waste, including the roll out and awareness raising of community composting locations, the investigation of possibilities of reduction of food waste from supermarkets in the area- with initiatives such as FoodCloud being supported to better establish themselves in the area. (They already serve Obair in Newmarket on Fergus among others). SDG 11,3
- p) As part of the commitment to Zero Waste Clare County Council could pilot an award scheme for Clare's first zero waste community. SDG 11,3,12
- q) Begin to pilot and implement 'Community Responsibility Plans' for refuse with communities being challenged and supported to produce zero waste. SDG 11,3
- r) DCCAS should commit Clare Co. Co. to the installation of public drinking water fountains –bottle filling stations at convenient locations in all urban settlements and ensure that they are installed in all local authority buildings. SDG11,3
- s) DCCAS should include a commitment by Clare Co. Co. to pilot compost toilets in national park, forest and other outdoor amenity settings and lead by example. 11,3, 12
- t) DCCAS should aim to ensure that planning permission is available for use of compost toilets. SDG 11,3,12
- u) DCCAS should commit Clare County Council should to using no plastic bottles/disposable coffee cups or food implements at any council organised event or in its normal work. SDG 11,3,4
- v) Clare PPN and CEN both noted that as well as the health promotional aspects associated with breastfeeding babies that it is sustainable, reduces dairy use and minimises energy use. Both organisations consider that this should be noted and organisations who support women to breastfeed should be supported. To our knowledge La Leche League which is hosted in Clare by Clare Women's Network is the only organisation offering support to new mothers and we think that initiatives to support those who choose to breastfeed should be mainstreamed and promoted by Clare Co. Co. Clare PPN and CEN recognise that breastfeeding is not possible or not the choice for some mothers and this should be respected. We suggest that Clare County Council could declare itself a breastfeeding friendly zone and lead by example. SDG 3,4,11

4. Community Resilience, Health and Well Being, Awareness Raising and Education

- a) Our workshop attendees noted that community responses to emergency situations caused by Climate and Biodiversity Emergency are not provided for in DCCAS and they call for this to be rectified. It will be necessary to have an emergency community plan in place in each settlement area and the LA should lead on implementing this. This community plan would include named volunteers in each area who have agreed to take responsibility for certain aspects of the situation and should include the provision of local access to emergency, food water and medical supplies, local access to shelter in a community or council owned building in the event that front line services are unable to reach people. DCCAS should include a commitment to plan, resource and train people for this purpose immediately, particularly in areas deemed to be at severe risk of flooding or other isolating events which may prevent access. It is envisaged that these actions should make use of existing community groups and structures and text alert schemes/ what's app groups etc SDG 4,11,3
- b) The establishment of these groups and structures would provide an opportunity for training in emergency responses, first aid and sustainable practices to be rolled out simultaneously and CEN/Clare PPN consider this a valuable opportunity which should be taken up by the local authority. SDG 4,11,3
- c) CEN/Clare PPN also call for DCCAS to include an action to identifying the location of community members who may be more vulnerable to such situations including Traveller Community Members in temporary dwellings, holiday makers in mobile homes, elderly or isolated communities and people with disabilities and with their permission the addition of their names, addresses, contact numbers to locally held emergency response plans. These lists should be updated regularly. SDG 4,3,11
- d) CEN/Clare PPN note that one of the impacts of Climate and Biodiversity Emergency is an increase in migration. This is not mentioned in DCCAS and this should be rectified – it is extremely likely that internal displacement will be a factor of Climate and Biodiversity Emergency within County Clare and DCCAS should include provisions to predict, monitor and plan for this. Secondly Climate and Biodiversity Emergency has already increased migration from inhospitable parts of our planet, the pressures experienced as a result of the Climate and Biodiversity Emergency lead to conflict over water, food and land and this five-year strategy should include provisions for the speedy integration and support for migrants into county Clare. Currently there are approximately 400 international protection applicants in Clare in either Direct Provision Centres or emergency accommodation. It is in the interests of the human rights of these people as well as to the benefit of the whole community and its resilience and cohesion that these methods of accommodating migrants are changed and people are not placed in institutional settings where they are excluded from proper integration with the community and the community does not have the benefits of their skills and capacity. SDG 3,4,11,1,16,8
- e) CEN/CPN call on DCCAS to include as an action the preparation of an inventory of all emergency equipment in the county and how or if it may be accessed. SDG 11,4

- f) DCCAS should include commitments and actions in regard to rainwater harvesting and micro energy generation with a view to increasing community resilience. SDG 4,3,11
- g) DCCAS should commit the LA to attending community events – matches, agricultural shows, parades, expos etc with a view to raising awareness about emergency and Climate and Biodiversity Emergency adaptation plans and encouraging involvement and buy- in from the public. SDG 4,3,11,17,16
- h) DCCAS should include an explicit recognition that young people are at the heart of campaigning for sustainable lifestyles and action on Climate and Biodiversity Emergency and a commitment to ensure that it establishes systems whereby their views, expertise and leadership are taken into account in all actions. Clare PPN suggests that any new Climate and Biodiversity Emergency and Biodiversity Committee should have a portion of its seats ring-fenced for secondary school aged young people or that it be required to set up processes to consult with them directly. This could be a pilot project and it would help combat cynicism and put young people at the heart of decision making. SDG 4,3,11,17,16
- i) On the adoption of the final CCAS the LA should host a publicly advertised public meeting (live streamed) detailing and explaining its provisions and set up an implementation review team with adequate representation from the Community Sector. SDG 9,16,17
- j) Clare PPN and CEN call on the strategy team to arrange a meeting with young climate activists in the county to hear from them directly before this strategy is adopted. Clare PPN is happy to facilitate this if necessary. SDG 4,17,16
- k) Clare PPN and CEN wish to see commitments in DCCAS that climate breakdown becomes a mainstream issue and would like to see Clare Co. Co.’s media personnel, its environmental officer and its heritage officer supported fully in publicising these issues through local media, www.clarecoco.ie and social media. SDG 4,16,17
- l) Clare PPN and CEN recommend that DCCAS includes a climate award scheme as part of its awareness raising toolkit- where groups who have innovated or demonstrated exceptional sustainable practice can be nominated for an award and so creating publicity for the practices as well as encouragement for groups. SDG 4,16,17

5. Water Quality, Flooding and Marine

- a) At our workshop attendees expressed a strong preference that the diversion of the river Shannon be prevented. They drew attention to the levels of leakage within our national water network and recommended that these be addressed before any scheme such as the Shannon diversion be progressed. It was also noted that water security will be threatened due to incidences of flooding, groundwater pollution and drought and considered plans to divert the Shannon as risky under those circumstances as it serves a large catchment area. DCCAS should include provisions for local authority and community input in the management of water resources. SDG 6,9,11, 12,14
- b) Several attendees noted that expensive protection projects for the Shannon banks may not be good use of resources and that the preferred course of action might be to plan for the expected flooding of land and to allow it to happen having established a compensation and preparation plan for those affected. SDG 9,11,12,15,16, 17

- c) Clare PPN/CEN wished to see stronger attention paid to the effects of invasive species on our water resources and wildlife and suggested that an action to monitor and assess this be included in DCCAS. SDG 6,14
- d) Our attendees opposition to the proposed Shannon LNG terminal in the Shannon Estuary was restated in respect of this heading because of its risk of impacting quality of water, and marine wildlife. SDG 6,9,11,12,14
- e) Clare PPN /CEN wished to see actions regarding the management of estuaries and rivers included in DCCAS in particular they wished to have included measures which involve community oversight to control dredging and control of river flows. SDG 6,9,11,12,14,15
- f) Clare PPN/ CEN request that provisions, actions and supports around continuous upgrades to group water schemes, reservoirs and public infrastructure be included in the DCCAS. SDG 6,9,11,12
- g) CEN/Clare PPN request that DCCAS includes actions designed to restore bogs, peatlands and wetlands to their natural functions – flood water storage. This in particular should be taken into account when planning for renewable energy infrastructure and forestry. What may appear to be ‘non-productive land’ may be providing a vital function. SDG 9,11,12,15
- h) CEN/Clare PPN suggests that a river bank management plan is drafted for the county. This should include an analysis of the current ownership and condition of river banks, a detailing of areas prone to flooding as well as an inventory of actions to prevent or plan for flooding – such as the planting of native tree or bush cover etc. CEN/Clare PPN would like to see actions to increase farmland buffer strips alongside rivers and contour lines for tree planting in all long term land use strategies. These may also provide green infrastructure for wellbeing and leisure use. SDG 9,11,12, 15
- i) In respect of housing Clare PPN/CEN recommend that DCCAS includes an action for the planning department to require plans for houses to include green spaces which will absorb rainfall and that the use of patios and paved areas is minimised except where necessary for safety and access. SDG 9,11,12,15,17
- j) DCCAS should state a commitment to ensure all UNWT directive requirements are met to protect bathing waters and that shellfish waters are protected. SDG 3,6,14,11
- k) As already detailed under our biodiversity and soil health heading our attendees request that a total ban on glyphosate/pesticides is enacted across the county with any continued usage being subject to emergency licences. A collection and disposal scheme for glyphosate and pesticides should be commenced alongside this. SDG 3,9,11,12,14,15
- l) DCCAS should in the interest of water quality and marine life, support any moves to ban single use plastic with exceptions made which will ensure the continued availability of items such as plastic straws for persons with disabilities who may require these as necessities rather than as options. DCCAS should indicate that Clare County Council intends to implement and enforce any national legislation to this end. SDG 3,6,9,11,12,15,17
- m) DCCAS should include a commitment to investigating sustainable drainage systems SDG 3,6,9,11,12,14,15,
- n) DCCAS should include an action in the short term which will see a complete end to any untreated sewage being discharged into the sea or rivers. SDG 3,6,9,11,12,14,15,

- o) DCCAS should include notice that Clare County Council intend to enforce regulations regarding the spreading of slurry. SDG 3,6,9,11,12,14,15
- p) DCCAS should include a commitment to work closely with organisations such as TEAGASC in order to ensure that training and support for changed practices in farming is available. Clare PPN also notes the existence of the organisation Talamh Beo which may be available to provide training or public seminars in respect of food sovereignty and sustainable food producing practices. SDG 4,3,6,7,11,12,14,15

6. Travel, Transport and Housing

- a) The DCCAS should include provisions to set up a task force on public transport in the county with the aim of ensuring all existing services work together in coordinated schedules and include more and more regular stops between key regional points such as Shannon Airport, Galway and Limerick, and that public transport, cycling and walking become viable options for the majority of the population in the county. This task force should be established under this adaptation strategy and have community representation. Clare PPN and our member groups feel very strongly that Clare Bus can be part of this strategy and that their experience in tailoring services to local needs should be availed of. SDG 3,9, 11, 12,15
- b) DCCAS should set annual targets to increase passenger load per vehicle and reduce total number of vehicles on the road with a combination of electric vehicles, autonomous vehicles – public transport, car sharing. SDG 3,7,9,11,15
- c) DCCAS should commit to ensuring that all new public transport offerings should be provided using zero or low emission vehicles with universal accessibility for those with disabilities. SDG 3,9,10,12,15
- d) School bus services should be expanded and subsidised to ensure that they become the dominant form of motorised transport to and from schools. SDG 3,9,10,12,15
- e) DCCAS should include measures to pedestrianize town centres with exceptions being made for public transport vehicles. SDG 3,9,10,12,15
- f) Several attendees of our workshop requested that DCCAS should include an action and a timeline to begin a process of upgrading or providing footpaths on all roads with provision both for walking and for people with disabilities to access them. SDG 3.9.10,12,15
- g) DCCAS should include commitments to establish park and ride facilities in commuter settlements in Clare with links to public transport. SDG 3,9,10,12,15
- h) DCCAS should ensure that Clare Co. Co. frontloads the expansion of the network of electric car charging stations in operation around the county with a view to ensuring that all areas of Clare can be comfortably accessed by electric vehicles. SDG 3,9,10,11,12,15
- i) DCCAS in each county including Clare should indicate their provision for infrastructure for recycling of Electric Vehicle batteries and the development of a regulated market for their end of life when they can be repurposed for other uses such as in conjunction with wind energy. Should this require a national legislative basis Clare's DCCAS should seek a commitment to this from DCCAE. SDG 3,9,10,11,12,15
- j) DCCAS should ensure that actions regarding the provisions of specific bicycle/walking/horse transport lanes, separate from roads are included in any long

term transport strategy. It is not necessary for alternative forms of transport to follow the same routes those developed for motor vehicles. SDG 3,9,10,11,12,15

- k) DCCAS should include actions to promote and support safe cycling in the county including by resourcing and supporting bicycle rejuvenation and loan schemes. SDG 3,4,9,11,12,15
- l) DCCAS should include measures to promote local and micro food production – including mandating green areas for drainage and possible food production in house plans, encouraging and supporting community gardens in public spaces and provision for them in all new housing estate applications. SDG 3,4,6,9,11,12,15
- m) In respect to housing Clare PPN/ CEN request that DCCAS includes provisions for ensuring water harvesting and grey water systems in housing plans and to promote and extend the opportunities for retro fitting houses for energy efficiency. Clare PPN/CEN recommend regular workshops provided by Clare Co. Co. in collaboration with SEAI or other such organisation with demonstrations to encourage take up and awareness of available grants for retrofitting. Clare PPN notes that there are further opportunities in this field for the establishment of apprenticeships in the area of retrofitting and solar panel fitting to create sustainable work and livelihoods for people in Clare and recommend that these opportunities are investigated with an opportunity for LCETB, LIT, LEO etc to lead in training and skills in such areas. SDG 3,4,6,9,11,12,15
- n) DCCAS should include clean air targets and measures to reduce and then cease the use of fossil, and carbon emitting fuels in urban housing estates and individual houses. SDG 3,4,9,11,12,15

7 Food Security, production and land use

- a) DCCAS should consider food security from the following perspectives – (i) local access to food in emergency situations and (ii) ensuring that diverse, local sustainably farmed food becomes a key aim of policy in the area of farming and land use, with less invasive and intensive models being piloted to allow for maximum recovery of soil. Our attendees considered that DCCAS should include commitments to working towards food independence and that an evaluation of the nutrition requirements of the current and projected population and the food production capacity of the county would be the most useful starting point for such initiatives. SDG 1,3,4,6,9,10,11,12,15
- b) DCCAS should include actions to support community and locally produced food including promotion, a streamlining, training and assistance programme for small producers to enable them to comply with health and safety regulations. As previously detailed support in terms of training and financial incentives or grant aid for farmers to diversify and for community gardens and a bio region branding campaign for Clare would all be beneficial in this regard. An awareness raising campaign in Clare about the impact of food choices using measures such as ‘food miles/true cost accounting would also be useful in this regard.
 - a. SDG 1,3,4,9,10,11,12,15
- c) DCCAS should include actions to introduce inform about and promote alternative regenerative forms of agriculture such as agro foresting, and holistic livestock management (zero carbon beef) and investigate actions such as the establishment of a mobile abattoir for Clare – visits farms, to reduce travel and trauma and stress hormones in the meat and to ensure meat is available for local consumption. This

might also help farmers by providing another option in respect to the monopoly held by the meat factories on beef prices. SDG 3,9,11,12,15

- d) Whilst promoting silviculture and agro forestry DCCAS should include actions to reduce and remove incentives in Clare for Sitka or mono crop non-native evergreen species forestry plantations. SDG 3,9,11,12,15
- e) Following the above mentioned tree survey and tree strategy (under Bio Diversity Heading) for the county implement schemes aimed at encouraging planting of native trees and increasing tree cover – these will assist with biodiversity and habitat restoration, carbon sequestering, air quality, prevention of erosion and add amenity and recreational value to areas in which they are planted. SDG 3,9,11,12,15
- f) DCCAS should include seek to prohibit clear felling in forestry and to promote continuous cover forestry. SDG 3,11,12,15
- g) DCCAS should include actions aimed at investigating the possibility for diversification within the forestry and wood product industry in a sustainable fashion. SDG 3,8,11,12,15
- h) DCCAS should include an explicit commitment to protect and restore bogs, peatlands wetlands and native woodlands which are valuable for their carbon sequestration and habitat provision. SDG 3,11,15
- i) DCCAS should include stated commitments that Clare Co. Co. will engage constructively with farmers and their organisations including Talamh Beo, the IFA and the new Beef Plan movement regarding the need for changes to farming practices around beef production, dairy production, hedgerow and habitat protection, waste disposal and pesticide use. Clare PPN and CEN recognise that the farming community will be vital in ensuring that Ireland and Clare are resilient to Climate and Biodiversity Emergency and recommend that processes are established to ensure that respectful communication can happen. SDG 3,4,6,9,11,12,15
- j) DCCAS should include commitments to diversify and build on the success of the wild Atlantic way in a sustainable way –some of the suggestions regarding greenways have been mentioned before in relation to public transport and encouraging cycling however it bears repeating that an extensive greenway route in Clare would be an investment in the future and in sustainable tourism and transport. CEN and Clare PPN consider that there are opportunities for constructing such greenways so that they and their surrounds act as hedgerows, as wildlife and pollinator corridors and as a source of diversified income to farmers and land owners. Whilst the preference of our attendees was for public ownership of such green infrastructure it was also considered that the option of renting ‘corridors’ of farmer’s land should not be ruled out as it may make the project more sustainable and attractive to farmers. The Burren Way currently compensates farmers for allowing passage through their lands and this model should be investigated. SDG 3,7,8,9,11,12,15,17
- k) DCCAS should include a commitment to develop a sustainability, conservation and expansion plan (through strategic non-compulsory land purchase) for the Burren National Park. Whilst this plan should include traffic management a traffic management plan is not sufficient to protect the heritage, landscape, and

biodiversity habitat that exists there. The park itself should be protected from development. SDG 3,4,8,9,11,12,14,15,17.

- l) DCCAS should include commitments to tourism related shuttle services in an extended group of villages and on a variety of routes with a view to ensuring that coach tours eventually use these services too. This is already in action at Bru Na Boinne and serves to protect the monuments and their surroundings from tour busses and noise pollution. In Clare it would provide a boost to local villages to have these services departing and returning from them rather than a tourist centre or hub. SDG 3,8,9,11,12,14,15,17

- m) DCCAS should include the setup of a taskforce with community representation to investigate and report on the options in Clare for extending use of anaerobic digestion, and biomass fuels, for the extension of willow based waste treatment, for bio char production and any other such potentially sustainable enterprises which might assist Clare in its adaptation to Climate and Biodiversity Emergency. It is also noted that such localised projects may be suitable for apprenticeships and rural social schemes and social enterprises. Clare PPN notes the success of Social Farming as a model to include marginalised people in farming and community life and suggests that opportunities in the green economy be considered from a social and wellbeing perspective as well as for their environmental and economic prospects. SDG 1,3,4,5,8,9,10,11,12,15,17

Clare PPN /CEN welcome this opportunity to make submissions in respect of the Draft Climate Adaptation Strategy and we trust that the views of our member groups and individuals will be given careful consideration. We welcome any queries about any aspect of this submission. We wish to state in conclusion our commitment to working collaboratively to maintain and improve the sustainability of our communities in a manner that seeks to include and consider every member of the population in Clare and the future generations to come.

On behalf of Clare PPN and Clare Environmental Network.

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Appendix 1: Sustainable Development Goals



<https://www.dcae.gov.ie/documents/DCCAE-National-Implement-Plan.pdf>

Appendix 2:

Members of the following groups participated in making this submission:

1. Clare Public Participation Network
2. Fridays for Future
3. Green Schools
4. Ennis Tidy Towns
5. An Taisce
6. Kulyana
7. Green Party
8. CELT
9. Futureproof Clare
10. Clare Women's Network
11. Moonbear Catering
12. Talamh Beo
13. FH Wetland Systems
14. Scarriff Community Gardens
15. Community Garden ?
16. Wild About Milltown Malbay
17. Three for the Sea
18. Transition Towns
19. Killone Water Scheme
20. Ennis and environs Zero Waste
21. Clare Leader Forum
22. Fridays for Future Limerick
23. Limerick Women's Network.
24. Fracking Free Clare
25. East Clare Community Co-op
26. Operation De- Plastification
27. Extinction Rebellion.