



Clare Public Participation Network  
Clonroad Business Park  
Clonroad  
Ennis  
Co. Clare  
086-1617375

[www.clareppn.ie](http://www.clareppn.ie)

**Clare Public Participation Network Submission/Clare Environmental Network Submission in respect of the Draft Clare Climate Action Plan 2024- 2029**

22 November 2023

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**Clare PPN** is a network of 342 community & voluntary, environmental and social inclusion groups from Clare. Clare PPN has three ‘Colleges’ which gather the member groups in terms of their interests and activities – these are the environmental college, social inclusion college and community and voluntary college. Clare PPN exists to facilitate the formal participation by the community sector in Clare County Council's decision-making structures and to serve as a support and information sharing network for the Community and Voluntary Sector in Clare. 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](http://www.clareppn.ie) and we are on Twitter @clare\_ppn and facebook.com/clareppn/

**Clare Environmental Network (CEN)** 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.

This submission was compiled in consultation with Clare PPN Environmental College and Clare Environmental Network and represents the views of those who participated in the PPN’s meetings on the topic, consultations and recent research projects carried out in 2022, and 2023. During 2020 and 2021 Clare

PPN conducted a series of consultations with our member groups to develop 'Wellbeing Vision Statements' for Clare and each of its municipal districts. The key themes of our Wellbeing Vision Statements inform this submission. The statements can be read here: [Wellbeing Statements | Clare PPN](#)

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## **Introduction:**

We welcome this opportunity to provide input on the Draft Clare Climate Action Plan 2024- 2029. Our members are more concerned than ever regarding the global and local impacts of Climate Change and Biodiversity Loss and they wish to send a message calling for an ambitious commitment to real change and transformative leadership from Clare County Council in this respect:

In February 2022, the latest report from the Intergovernmental Panel on Climate Change (IPCC) issued its starkest warning yet on the threat of severe climate breakdown. This document, the second of four parts of the IPCC's Sixth Assessment report, warns that 3.3–3.6 billion people – or half of the world's people – are “highly vulnerable” to serious impacts from the climate crisis; a billion people in coastal areas face inundation; mass die-offs of species including trees and coral have already begun; and close to a tenth of the world's farmland is set to become unsuitable for agriculture.

The authors make clear that climate change is already causing dangerous and widespread disruption to human well-being and the health of the planet and that exceeding 1.5 degrees Celsius of warming over pre-industrial levels will result in unavoidable extreme impacts. The report shortens the timelines relating to the action required to prevent the most catastrophic climate breakdown. <https://www.ipcc.ch/report/ar6/wg2/>

António Guterres, the UN secretary general, said of that report: “I have seen many scientific reports in my time, but nothing like this. Today's IPCC report is an atlas of human suffering, and a damning indictment of failed climate leadership.” Last week, (November 2023) Guterres called for ‘dramatic climate action’ in response to a new report from UNEP which indicates that the planet is on course for a 3 degree temperature rise this century.

<https://news.un.org/en/story/2022/02/1112852>

The IPCC report reiterates the need for decisive, systemic climate action from national and local governments, concluding that: “The cumulative scientific evidence is unequivocal: Climate change is a threat to human well-being and planetary health. Any further delay in concerted anticipatory global action on adaptation and mitigation will miss a brief and rapidly closing window of opportunity to secure a liveable and sustainable future for all.” <https://www.ipcc.ch/report/ar6/wg2/resources/press/press-release/>

Here in Ireland, the Dáil declared a Climate Emergency in May 2019. In September 2021, amendments to the Climate Action and Low Carbon Development Act 2015 came into force, requiring the development of five-year carbon budgets that provide for a reduction of 51% in annual GHG emissions by 2030 compared to 2018.

This 2030 deadline will occur one year after the time period to which this Climate Action Plan applies.

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### **Comments and recommendations on the draft:**

#### **Rights of Nature:**

Clare PPN has adopted a 'RIGHTS OF NATURE' approach to its work and requests that Clare County Council does similar and that this framework is reflected in this climate action plan.

The natural environment and biodiversity must be protected for future generations in Co Clare. 'A Rights of Nature' approach proposes a way to rethink our relationship with nature, in which humans are connected to and dependent on the natural environment and in which both humans and nature have equal and intrinsic rights to exist, regenerate, evolve and thrive. It changes the conception of the environment, nature and the planet from one which is understood as being available to exploit or from which we seek to extract the maximum resources to one whereby we understand the need to nurture protect and restore it. We note that the recent Citizen's Assembly on Biodiversity Loss has made very strong recommendations supported by more than 83% of the assembly's participants, in this respect including a recommendation that this approach is inserted in the constitution. While we will be making a similar recommendation to the forthcoming biodiversity strategy for Clare, it is important to ensure that Climate Action is also underpinned with a clear understanding of the finite and irreplaceable bio-systems of the planet. In particular where green – tech approaches to carbon reduction, energy generation and agriculture are concerned.

- **We recommend that a Rights of Nature approach is enshrined in Clare's Climate Action Plan and that actions in the Plan are informed by this approach.**
- **Mining: plans to extract minerals through mining activity in Co Clare are incompatible with the protection of the natural environment.**
- **We recommend that Clare's Climate Action Plan includes a commitment not to facilitate or allow mining, nor to allow the extraction of any non-renewable resources within the county.**

- **We recommend that Clare County Council commit to re-wilding or planting with appropriate native forest an annual portion of the land under its direct ownership or control.**

### **Fossil Fuels:**

Whilst there are many aspects of this current Draft which we welcome we wish to raise concerns regarding the role, remit and governance of Clare Co Co and Climate Action. We were concerned to see a narrow framing of Clare County Council's role in Climate Action stated within the Climate Action Plan:

*'While the Climate Action Plan will be ambitious to reflect the leadership role of local government on climate action, the Plan will not include actions whereby their implementation and achievement fall outside the role, remit, and governance of the local authority'*

We fully recognise the limited role of the Local Authorities in Ireland, however, we note that within areas over which Clare County Council has exercised both its authority and influence that we can see a drive both historic and current towards the expansion of fossil fuel dependent projects:

We note the above in particular in relation Clare County Council's stated ambitions within its current County Development Plan 2023- 2029 (which falls within the role, remit and governance of the local authority):

*"to facilitate the delivery and expansion of the Natural Gas infrastructure throughout the County for both domestic and business/industry use..."*

We note with concern that there is no reference in this Draft Climate Action Plan to the question of the future of gas infrastructure in the county.

This objective in the Clare CDP is counter-productive to the requirement to reduce fossil fuel burning and runs counter to the commitments – as set out in Clare's Draft Climate Action Plan – to facilitate the transition to a low-carbon economy. Climate scientists, including the Intergovernmental Panel on Climate Change (IPCC), have warned that humanity must rapidly shift away from burning fossil fuels – including fossil gas – in order to avert catastrophic climate breakdown. <https://www.ipcc.ch/report/ar6/wg2/>

- **We recommend the inclusion in the Climate Action Plan of a commitment to ban all new investment in fossil fuels or in fossil fuel infrastructure including so called 'natural' gas or LNG.**

### **Ennis Data Centre:**

We note that Clare County Council's previous County Development Plan 2017- 2023 was amended to allow for the zoning of land for the development of a 'Data Centre Campus' Description of Variation No.1 to the Clare County Development Plan 2017-2023 ([clarecoco.ie](http://clarecoco.ie))

Further to this Clare County Council's Corporate Plan 2019 – 2024 pg 21 includes the following as a priority action:

*4. Progress the development of Data Centers in County Clare*

We note that there is no reference in this Draft Climate Action Plan to one of the most significant climate-related issues in Clare, namely this proposed data centre in Ennis, a facility that would, if built, significantly increase Ireland's greenhouse gas emissions (by 1%), both through the burning of fossil gas on site to generate electricity and through the huge consumption of electricity from the national grid. [Drilling for Data: Growing energy needs fuelling rise in data centre emissions \(thejournal.ie\)](#)

The proposal to build this data centre, which has been heavily promoted and advocated for by Clare County Council from the outset is incompatible with several goals and objectives – and legal obligations – of Clare County Council, including several outlined in this Draft Climate Action Plan. The Plan contains numerous references to its commitment to be a “leader” on climate action in the county, including the Vision Statement (page 4): “Clare is a national leader in Climate Action...”

Alongside large scale carbon emissions, electricity consumption and water usage when considering a just transition in Clare we note the very limited benefits for the population of Clare likely to result from this project with skills and labour shortages already prevalent in the construction industry.

We consider that Clare County Council's widely publicised support for this project seriously undermines its genuine and diligent efforts in other spheres with regard to Climate Action and particularly weakens Clare Co Co in the perception of those being asked to make significant changes in their own lives. We understand that such plans were made at a time when the implications of this type of development for Clare may have been poorly understood but we call on Clare County Council to show its leadership now in this regard.

We recommend that Clare's Climate Action Plan:

- **include a commitment not to build, promote or support data centres in Co Clare**
- **stipulates that no new industrial developments that increase the burning of fossil fuels be permitted in Clare;**
- **stipulates that no developments be allowed that will result in a significant increase in consumption of electricity/fossil fuels.**
- **Commits to working with all stakeholders to ensure that coal burning is ended at Moneypoint. We note too with concern that in relation to a just transition, the coal currently in use originates from Cerrejon Mine in Colombia which has been at the centre of allegations of human rights abuses and environmental degradation.**

## **Renewable Energy:**

On a more positive note, again regarding the role, remit and governance of Clare County Council we note that in many European countries, a key driver of climate action and of a Just Transition is the development of community-owned renewable energy projects. Ireland has fallen far behind in this respect, with virtually no community-owned energy projects in existence. We welcome the commitments within this Draft Climate Action Plan to awareness raising and education for Climate Action and we recommend that this ‘education’ remit is understood in the most practical and applicable sense for example ensuring that communities in Clare know what renewable energy projects are possible in what locations and what resources may be availed of to instigate them.

- **We recommend that the Climate Action Plan for Clare commits to supporting and facilitating local communities in the development of micro-generation and renewable energy projects that are owned and controlled by those communities.**
- **We also recommend that Clare County Council commits to investing directly in renewable energy projects, on council owned land, to supply electricity for the council’s own needs, and or for community needs when that becomes possible under legislation. We note the recent consultations on ‘private wires’ which sought the public’s views on permitting private energy infrastructure and supply outside of the national grid and whilst our members have serious concerns about this prospect as related to industry, one aspect of it which would be welcome would be the ability for communities to develop community owned renewable energy networks.** [gov.ie - Minister Ryan launches consultation on Private Wires \(www.gov.ie\)](https://www.gov.ie/news/department/2022-05-11-minister-ryan-launches-consultation-on-private-wires)

We consider that under the current role, remit and governance of Clare County Council that it would possible for it to invest in, instigate or take over strategic energy projects, in the same way that it took over several tourism interests earlier this year:

[https://www.clarecoco.ie/your-council/\[news\]/iconic-visitor-attractions-transferred-to-clare-county-council.html](https://www.clarecoco.ie/your-council/[news]/iconic-visitor-attractions-transferred-to-clare-county-council.html)

## **Just Transition:**

We strongly welcome the commitment to a just transition within the Draft Climate Action Plan however we consider the definition used for it to be reductive and not reflective of the current understanding and progression of the term and concept within policy making in Ireland. We consider it crucial for the achievement of ambitious Climate Action in Clare that just transition is understood and promoted as a principle and practice.

We note that the definition of a Just Transition used in the Draft Climate Action Plan for Clare is as follows:



*‘one which seeks to ensure transition is fair, equitable, and inclusive in terms of processes and outcomes’.*  
(National Economic and Social Council).

- **We recommend that for the purposes of the Draft Climate Action Plan that the following definition is used in its place:**

‘A ‘Just Transition’ is one which ensures the deliberative participation of affected and vulnerable communities in the transition to a carbon neutral society, so ensuring that people's livelihoods, safety, socio-economic rights and wellbeing are protected through the transition.

### **Community Development:**

Community Development is “a developmental activity comprised of both a task and a process. The task is social change to achieve equality, social justice and human rights, and the process is the application of principles of participation, empowerment and collective decision making in a structured and coordinated way”

<https://www.cwi.ie/wp-content/uploads/2016/03/All-Ireland-Standards-for-Community-Work.pdf>

Regarding the ability of communities in Clare both to take action to mitigate climate change and also to adapt and become resilient in the face of the effects of climate change, community development projects are of crucial importance. Without them, people across Clare will be left behind and it will be extremely difficult for a just transition to be achieved. We need community development projects and workers to help communities, in particular vulnerable communities to respond to the crisis and to deliver climate action.

- **We recommend that the Climate Action Plan for Clare commits to seeking funding for community groups and organisations to establish independent community development projects particularly in deprived areas of the county and that this is framed within the just transition objectives.**

### **COMMUNITY WEALTH BUILDING**

- **We recommend that Clare County Council embed a community wealth building (CWB) approach in its operations, and that this approach be expressly committed to in the Climate Action Plan.**

The community wealth building (CWB) model, which has been gaining momentum across the world in recent years, is a people-centred, place-based approach to local economic development that aims to build local economies that are collaborative, inclusive, sustainable, democratically controlled and

where the wealth that is created is retained locally and shared equitably. The CWB model is explained in detail in Clare PPN's recent publication, 'Fair Clare: Securing Socio-Economic Rights & a Just Transition in Clare': [https://clareppn.ie/wp-content/uploads/2023/10/Fair-Clare\\_Socio-Economic-Rights-a-Just-Transition-in-Clare-Final-PDF.pdf](https://clareppn.ie/wp-content/uploads/2023/10/Fair-Clare_Socio-Economic-Rights-a-Just-Transition-in-Clare-Final-PDF.pdf)

A community wealth building approach is complimentary to 'circular economy' and social enterprise development and is an area in which the local authority can be directly and indirectly involved.

### **Green Jobs:**

With a view to ensuring a Just Transition in Co Clare, we recommend that the definition of a 'green job' be reconceptualised in this Climate Action Plan, so that as well as the (hugely important) jobs in renewable energy, retrofitting etc, it includes all jobs that sustain nature, care for our communities, environment and habitats. Care work is a huge and undervalued sector in Clare, (employing more than 4,000 people at present) and is set to grow in the years covered by this Climate Action Plan. We consider that efforts to make this work fair, well paid and with good working conditions are necessary to ensure a just transition in Clare and in particular to create sustainable communities. We further note that this is a female dominated sector and that as long as it remains low paid it will contribute to the knock on effects of gender inequality and child poverty in Clare both of which must be addressed in order to secure a just transition.

- **We recommend that a commitment is made by Clare Co Council to promote and support decent work in all areas where labour contributes to caring for others and/or the environment.**

### **AGRICULTURE**

Agriculture will have to be a key area for emissions reductions in Co Clare. The sector is currently by far the county's biggest contributor to climate change, producing 42% (or 45?) of greenhouse gas emitted in Clare.

We note that this Draft Climate Action Plan contains only very limited references to agriculture; fails to communicate or convey the enormous role that agriculture in Clare plays in respect of greenhouse gas emissions; and contains no objectives relating to agriculture.

We note also that this Draft Climate Action Plan contains conflicting figures for emissions from agriculture in Clare. On page 34, there is a figure of 42% and also a figure of 45%.

We further note that the export-led model of Irish agriculture means that many carbon emitting aspects of Irish farming are in fact calculated elsewhere – in the countries of consumption rather than the country of production. Our



participants stressed that they want Ireland and Clare to be responsible global citizens who seek real reductions in our emissions not reduction via accounting methods. They stress that as one of the wealthiest countries in the world Ireland is well positioned to take action whilst protecting our communities from the worst effects of climate change and they want to see the farming community supported, resource and encouraged to make the necessary transition to sustainable practices which safeguard our environment and habitats.

This transition in farming practices must happen in a way that protects farmers' livelihoods. (Beef farmers in Clare are at risk of an unjust transition due to the economically unsustainable nature of beef farming coupled with the urgent need to reduce emissions.)

We note with disappointment that the Draft Climate Action Plan contains no mention of organic farming and only a cursory reference to regenerative farming.

In light of the huge difference in labour intensity between beef farming and organic growing, there is a strong need for financial support for organic growers to be substantially increased. This would reduce emissions in agriculture, enhance food security and provide diversification opportunities for farmers.

The right policy framework can ensure not only that farmers earn a fair living while producing food in a climate-friendly way, but also that people in Clare would have access to locally produced, nutrient dense, chemical-free food. In this regard, farming organisation Talamh Beo some of whom are based in Clare, has an excellent Local Food Policy – see documents at this page: <https://talamhbeo.ie/projects/local-food-policy/>

- **We recommend that this Climate Action Plan commits Clare County Council to planning, promoting and where possible funding a transition to alternative farming models, particularly those based on food security.**

### **Retrofitting:**

We welcome the commitments in Objectives BE1.5 and BE1.7, to undertake retrofitting of Council buildings and Social Housing Stock. However, there are major barriers to embarking on home retrofitting for many other households in Clare.

- **We recommend that Clare County Council engages with all the approved housing bodies in Clare to establish the status of retrofitting those dwellings and that it seeks supports for this work to be carried**

**out if it is not already underway. We recommend that this is included as a commitment in the Climate Action Plan**

- **We recommend that the Climate Action Plan for Clare commits Clare County Council in its climate action leadership role to seeking to secure broader access to the SEAI's Fully Funded Energy Upgrade Scheme, for low- and middle-income households as well as to grants and loans to protect the living conditions of structurally vulnerable groups in Clare.**
- **In the case of those living in private rented accommodation or under the HAP and RAS schemes, we recommend that strong safeguards be put in place for tenants, such as legislative protection introduced to protect their tenancies during retrofitting by landlords in an effort to prevent so-called retro-victions. We understand the limits of Clare County Council's remit in relation to national legislation however we recommend that it uses its influence to call for this protection.**
- **We recommend that the commitment in Ireland's national housing plan, to introduce a minimum BER for rental properties commencing in 2025, is honoured.**
- **Further, we recommend that collective or neighbourhood-based approaches to home retrofitting or partial retrofitting be expanded and that funding be directed towards them to allow for economies of scale and to remove some of the administrative burdens from individuals.**

### **Transport Task Force:**

In recent research with groups around Clare there was shared consensus on the impracticality of existing public transport networks in Clare when considered as an alternative to private car use. Some of these issues related to bus design, accessibility, frequency, over-crowding, last mile issues, cost, and a lack of cohesion regarding route design and the links between various different service providers. We further noted that active travel schemes in the county are positively perceived as amenities but not as alternative transport options. On this basis we recommended the inclusion within Clare County's Local Economic and Community Plan of a commitment to establish a Public Transport Taskforce in Clare with a view to ensuring services work together and meet community needs.

- **We recommend that a similar commitment is made in this Climate Action Plan to support and assist with establishing this vital group.**

### **COMPOSTING/FOOD WASTE:**

We welcome Objective N3.2, to “Investigate the development of suitably located composting centres to promote circularity of green waste”.

However, there is scope for a much more ambitious approach to community composting in Co Clare. A huge amount of food waste is produced every year, and this is a significant climate issue.

- **We recommend that the Climate Action Plan includes a commitment to develop large-scale composting of food waste, to be undertaken directly by Clare Co Council on Council-owned land, or as a social enterprise supported by the Council.**

This week it was reported that bio-methane, a more environmentally friendly alternative to fossil gas, has been injected directly into the gas supply network in Northern Ireland for the first time. The gas is produced by an anaerobic digester at in Dungannon, Co Tyrone, which has been generating renewable gas from **food waste** since 2014. We note the opportunities in this area for Clare and welcome efforts to develop them with community consent, so long as safeguards are in place to ensure that such efforts will not lead to an increase in livestock numbers, the use of arable land for production of bio matter or ammonia pollutants.

<https://www.rte.ie/news/regional/2023/1120/1417535-biomethane-northern-ireland/>

## **TOURISM**

Objective C2.6 of the Draft Climate Action Plan is to support County Clare “in transitioning to a more sustainable tourism destination”. We urge Clare County Council to reflect on the fact that a high proportion of tourists travelling to the county do so by air, and that air travel is a major contributor to climate change.

- **We recommend that the Climate Action Plan commits to exploring ways to reduce Co Clare’s dependency on air travel-based tourism.**
- **Furthermore, we recommend that when public funding is allocated to tourism initiatives, priority is given to community-led and owned tourism models.**

### **Funding:**

We note the proposed allocation in Budget 2023 of 3 Billion Euros for Climate Action in Ireland during the coming years. We also note that Clare County Council has a fund for Climate Action of €570,000 available now and that it administers a range of funding opportunities for communities and groups in Clare.

- **We recommend as a key positive action that all recipients of all funding streams from Clare County Council are required to demonstrate their commitment to climate action with the expectation matched to the level of funding. This can be as simple as including a question on application forms – ‘how will you minimise carbon emissions from this project?’ or ‘Clare County Council is committed to supporting climate action, if relevant please demonstrate what climate actions are included in your project or proposal?’**

### **Monitoring and Reporting:**

Clare PPN participants are concerned in particular with the lack of clarity in this Draft Climate Action regarding Monitoring and Reporting with various bodies from CARO to the LGMA being named as responsible for the provision of data. The key issue that needs to be monitored within this plan is the **annual reduction in Carbon Emissions** from each sector in the county and from the activities of the general population. Without careful monitoring of carbon emissions it will not be possible to evaluate the effectiveness or harm caused by any measure or action. If Clare County Council aspires, as stated in the CAP, to be a leader in Climate Action it will need to establish a rigorous set of baseline data including from the various sectors in Clare and from the activities of the general public. We note and commend that Clare Co Co has such measures and metrics in place for the monitoring of its own carbon emissions and while we commend this we are calling for a wider commitment to working from actual data in Clare.

- **We strongly request that this Draft Climate Action Plan includes a stated commitment to establish baseline carbon emissions from all sectors and activities in the county at the outset of the plan in 2024 and, following that, a commitment to set targets and report on progress against those baselines on an annual basis with the view of a reduction of 51% from 2018 baselines being achieved by 2030 and net zero by 2050.**

We note our member’s concerns regarding the lack of specificity of data and monitoring relates to Ireland’s National Climate Action Plan as well as to each local authority Climate Action Plan. At a national level this issue is currently the subject of litigation.

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Clare PPN/CEN welcome this opportunity to make submissions in respect of the Draft Clare Climate Action Plan 2024-2029 and we trust that the views of our member groups and participating 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 and positively 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.

Any queries in relation to this submission can be directed to Sarah Clancy, Clare PPN Coordinator, for the attention of the Secretariat of Clare PPN:

Email: [sarah@clareppn.ie](mailto:sarah@clareppn.ie)  
Tel: 087-1617375