26th August 2016

Re: Consultation on the Statement of Strategy for Transport, Tourism and Sport 2017-2019

Dear Ms Cullen,

The Environmental Protection Agency (EPA) acknowledges the invitation for submissions in relation to the Statement of Strategy for Transport, Tourism and Sport 2017 – 2019 and welcomes this opportunity to provide input to the Strategy. This submission focuses primarily on the environmental considerations of the strategy for transport, most particularly in relation to climate change and air pollution.

**International Context**

At the COP 21 conference in Paris in December 2015 an historic global agreement was reached on actions to tackle Climate change. Two of the key goals announced were:

- to hold global temperature increase well below 2 degrees Celsius while aiming to keep the increase below 1.5 degrees
- agreement that global greenhouse gas (GHG) emissions need to peak as soon as possible with emissions balanced by removals during the second half of this century

As a step towards achieving these and the EU’s own shorter term goals, the European Commission has recently proposed\(^1\) binding GHG emission reduction targets for Member States for the period 2021 to 2030 with an overall goal of 40% reduction in emissions on 1990 levels by 2030.

On the same day as the 2030 proposals were announced, the Commission also announced a European strategy for low emission mobility\(^2\) with the twin aims of increasing efficiency and reducing emissions in the Transport sector. To achieve these aims the strategy proposes accelerating the transition to zero and low emission vehicles while encouraging a shift to lower emission transport modes. A recent report by the European Environment Agency\(^3\) has also highlighted that a modal shift away from road transport and a switch to alternative fuels are among the key future challenges to be overcome if Europe is to achieve its decarbonisation targets.

**National Context**

The national climate policy goal\(^4\) is to reduce overall emissions of carbon dioxide (CO\(_2\)) by at least 80% of 1990 levels by 2050. Ireland also has a number of shorter term targets that it has to achieve, including an obligation to deliver 10% of transport energy from renewable sources by 2020. Ireland’s 2020 greenhouse gas reduction target is to achieve a 20% reduction of non-Emissions Trading Scheme sector emissions (including Transport emissions) on 2005 levels with annual binding limits set for each year over the period 2013-2020.

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\(^3\) TERM 2015: Transport Indicators Tracking Progress, EEA 2016
\(^4\) National Policy Position on Climate Action and Low Carbon Development, DECLG 2014
Our transport system is highly fossil fuel dependent, which results in significant emissions of greenhouse gases (GHGs) and air pollutants. Overall, 19.5% (11.3 Mt CO$_2$eq) of Ireland’s GHG emissions were from the transport sector in 2014, an increase of 2.5% compared with 2013 levels, and this proportion is expected to increase substantially by 2020. The latest EPA GHG projections, published in March 2016 estimated that by 2020 Transport sector GHG emissions would increase by a further 10-16% as a result of economic growth and dependant on the implementation of mitigation measures. This is a worrying development as it could have significant financial, political and environmental implications for Ireland.

The transport sector accounted for 12% of all air pollutant emissions in 2015 and is one of the largest contributors to particulate matter pollution in cities. There are significant human health impacts from particulate matter (PM) and nitrogen oxide (NOx) emissions, including cardiovascular disease, lung disease and heart attacks$^5$. The diesel car fleet is a key source of particulate pollution and diesel cars also emit more NOx than comparable petrol fuelled cars. Proposed measures to tackle the emission of GHGs from the Transport sector will also need to consider air pollution effects to ensure that there is a balanced approach, but a significant reduction in car usage, particularly in urban areas, will need to be prioritised.

**Strategy**

Achieving emission reductions in the transport sector will involve a range of policies and measures to support technological solutions and behavioural change, and some difficult choices will have to be made. Some of these fall outside the remit of the Department of Transport, Tourism and Sport and, therefore, it will be important to ensure that they are effectively co-ordinated.

- There needs to be a modal shift away from the private car to an efficient sustainable transport system through better alignment of land use and transport planning and by making public transport quicker, cleaner, more convenient and more affordable.
- All land transport forms (trucks, car, bus, train) need to become much more fuel efficient, and a significant increase in alternative fuel and electric vehicle use needs to be incentivised.
- A prudent mix of planning, infrastructural investment and fiscal measures to bring about a reduction in transport demand is urgently needed.

These and other measures will need to be driven as part of the National Low Carbon Transition and Mitigation Plan, and when implemented will play a key role in reducing our CO$_2$ emissions. An integrated strategy, tackling GHG and air pollutant emissions together, needs to be pursued to ensure that the public health co-benefits are realised. Finally, information provision to support citizens to engage with the new Transport strategy should form part of the process.

The EPA would welcome the opportunity to meet with your Department to discuss both climate change and air pollution issues and how these can be addressed in the new Statement of Strategy for Transport, Tourism and Sport.

Yours Sincerely,

Stephen Treacy
Office of Environmental Sustainability
Environmental Protection Agency

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$^5$ Air Quality in Ireland 2014, EPA