Dear Sir/Madam;

Thank you for the opportunity to participate in the development of the DTTAS Statement of Strategy.

The Department must fundamentally rethink approach to transport, to bring it into line with national law and policy. Currently the Department is operating directly contrary to national policy, failing to work towards national policy targets, and failing to put Ireland on a path to meeting its EU and international commitments.
The current approach is leading to a predicted increase in transport sector emissions by 19% between 2013 and 2020 and a further 20% over the period 2020 to 2035.¹

We are greatly concerned by the recent adoption of a Transport Strategy for the Greater Dublin Area which predicts increased numbers of motor vehicle trips, increased lengths of trips and increased emissions of greenhouse gases and air pollutants damaging to public health. The non-compliance of the Strategy with the obligations on public bodies under section 15 of the Climate Action and Low Carbon Development Act 2015 was one of the issues raised with the National Transport Authority and the then Minister but it was adopted nonetheless. We believe the adoption of the Strategy was in breach of the Minister's legal obligations under the Act.

**We recommend that the Statement of Strategy explicitly reference the obligations imposed by the Climate Action and Low Carbon Development Act and set out how those obligations will be met by the Department.**

The previous Statement of Strategy is a good indication of why emissions are predicted to increase. The main elements of expenditure identified in the strategy will all lead to increased not decreased emissions.

National policy is set out in “Smarter Travel A Sustainable Transport Future A New Transport Policy for Ireland 2009-2020”. It is deeply surprising, looking at the previous Statement of Strategy, that it seems to be considered to be an aspect of transport policy and not the overall policy.

It is dismaying that the previous Statement of Strategy does not refer to the targets set in the national Smarter Travel policy document. It is equally dismaying that we are manifestly not on track to meet those targets and that, to the best of our understanding, the Department of

¹. (Environmental Protection Agency, 2015: http://www.epa.ie/pubs/reports/air/airemissions/EPA%20202015%20GHG%20Projections%20Publication%20FINAL.pdf)
Transport does not appear to consider this to be a failure on its part to comply with national policy.

The then Taoiseach, in his foreword to Smarter Travel, said: "However, the real challenge is to change mindsets..."

The then Minister for Transport said in his foreword: "Almost all agreed that “business as usual” is not an option...Because of the extensive consultation and public response, it can truly be said that this is the people’s policy “to change our unsustainable habits in the travel and transport area”. If we all accept it and make a serious effort to translate the vision into reality we will succeed in enhancing communities, improving our environment, making our economy more efficient and competitive and significantly adding to the quality of life of all our citizens.

From the outside our perception is that mindsets have not changed and the Department of Transport continues to implement "business as usual". In doing so it is failing to implement national policy as set out in Smarter Travel.

This new Statement of Strategy must set out to meet the targets set out in Smarter Travel and outline how the measures which would enable them to be met will be considered.

The proposal from the previous Statement of Strategy to promote increases in aviation passenger numbers is in breach of the Department's and Minister's obligation under the Climate Action and Low Carbon Development Act. The new Statement of Strategy should contain objectives to reduce aviation emissions consistent with the Act.

Yours, etc,

Tony Lowes
Director