



Ireland's Climate Action Plan 2021



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Executive Summary

The Climate Action Plan 2021 (CAP21) sets out almost 500 actions to support Ireland's journey towards a 51% reduction in greenhouse gas emissions by 2030 (from a 2018 baseline) and carbon neutrality by 2050. Actions were proposed by all Government departments in light of the carbon budgets set by the Climate Advisory Council and the legally-binding targets set out in the Climate Action and Low Carbon Development Act 2021. These targets are aligned with the European Green Deal.



This report summarises the Climate Action Plan 2021 and its impact on citizens, communities and enterprise. It is broken down into 7 key sectors from the CAP21 (see pg. 5).

The scope of the plan is considerable. By 2030, the plan envisions large scale renewable electricity generation, almost a million electric vehicles (EV's) on the road, retrofitting 500,000 homes to BER B2 or better, increasing cost of emissions for industry and reducing chemical nitrogen usage on farms by 20%.

The CAP21 quarterly progress updates indicate that a greater rate of change is required to achieve these measures and to meet overall sectoral emission reduction targets.

The Climate Action Plan may present significant challenges to Irish enterprise. To overcome these, organisations will need to set a clear strategy to maximise their opportunities for growth in a changed market, adapt to new requirements, or counter an existential threat.

Sector Summaries

Electricity 01

75% reduction in CO₂ eq.¹ emissions by 2030

- Large-scale generation from wind is the primary focus, solar secondary.
- Increase flexibility of electricity demand (reduce demand when supply is lower).
- Implement schemes/grants for anyone to invest in renewable generation and sell back to the grid.

Built Environment 02

40-45% reduction in CO₂ eq. emissions by 2030

- Eliminate fossil fuels for heating buildings.
- Use more low-carbon materials in construction.
- Retrofit 500,000 homes and install 400,000 electric heat pumps.
- District heating - one large boiler to supply a geographic area.

LULUCFM 03

58% reduction in CO₂ eq. emissions by 2030

- Increase rate of afforestation.
- Improve management and carbon sequestration of peatlands, grasslands and marine environments.
- Improve biodiversity in all biospheres.

Transport 04

50% reduction in CO₂ eq. emissions by 2030

- 845,000 electric vehicles on the road by 2030.
- Expand rail services; improve capacity and frequency of public transport; increase cycling investments, pedestrianize city centres.
- Reduce combustion engine vehicle kilometres.

Enterprise & Industry 05

35% reduction in CO₂ eq. emissions by 2030

- Increased cost of commercial CO₂ eq. emissions (increased price of carbon and lowered ETS cap).
- Decarbonise heating in industrial processes.
- Provide grants through Enterprise Agencies.
- Support decarbonisation through new regulations.

Agriculture 06

25% reduction in CO₂ eq. emissions by 2030

- Reduce emissions from chemicals.
- Breed more efficient beef cattle and lower slaughter age.
- 5 x increase in land used for organic farming.
- Increase investment in R&D.

Circular Economy 07

14% reduction in CO₂ eq. emissions by 2030

- Bioeconomy research, development and innovation grants available for businesses.
- Waste measures are focused primarily on preventing waste ahead of recycling and re-use.
- Increased regulation and research in the mineral exploration and mining sector.

¹ CO₂ equivalent is a unit of measurement used to compare the emissions from various greenhouse gases based on their climate effects.



01. Electricity

Key Takeaways

Decarbonising electricity generation is required to meet targets in other sectors.

Large-scale generation from wind will provide ~15 Gigawatts (GW) capacity, and solar ~ 5.5GW.

Electricity demand will become flexible (reduced when supply is lower).

Schemes/grants for anyone to invest in renewable generation and sell back to the grid.

4 Key Areas

01 Electricity Demand Management

Ensuring demand can be reduced when supply is lower.

Ensure that 20-30% of system demand is flexible by 2030.

Review the demand side strategy, including the policy context for Large Energy Users.

02 Microgeneration

Small-scale electricity generation e.g. solar panels on homes.

500MW of renewables to be delivered through community-based projects.

Private homes and businesses to support further microgeneration.

03 Large-Scale Renewable Generation

Leverage large-scale renewable generation to achieve 80% Renewable Energy Sources of Electricity (RES-E).

Focus is on building onshore (~8GW) and offshore wind capacity (~7GW). Solar to contribute ~5.5GW generation.

04 Supporting Measures

Deliver ~2GW of new flexible gas-fired power stations to ensure security of supply.

Deliver three new interconnectors to NI, GB and EU, and explore potential with other countries.

Expand and reinforce the grid with the addition of new lines, substations and technologies.



The Importance of Electricity

The electricity sector is particularly important to meeting the overall 51% GHG emission reduction. Other sectors rely on renewably-generated electricity to meet their targets as they switch from fossil fuels to electricity. This will lead to a 19-48% increase in electricity demand by 2030.



What does this mean?

For All

- The State will pay market value for small-scale renewable electricity privately generated and sold into the grid.
- An entity generating <6kW or a homeowner, is eligible for up to €2,400 towards the installation of solar panels (~18 panels).
- Free smart meters will provide accurate information on electricity usage.
 - Associated smart services (e.g. Time-of-Use tariffs) will incentivise consumption at times when electricity is cheaper and/or greener.



For Communities and Enterprise

- Communities generating up to 1000kW and SMEs >50-400kW, may be eligible for grants or tariff payments to support RES-E installations. To be determined in 2023.
- Large-scale energy generators and communities generating 1-5MW will bid for guaranteed prices and premiums on power generated from a set amount of solar, wind or bioenergy capacity, for up to 16 years.
 - Aim is to make financially unviable RES-E projects, viable.
- Electricity generation will become more expensive unless associated emissions are reduced (due to EU's Emission Trading Scheme).



Sectoral Emission Ceiling

Emissions reduction target of 75% required of Electricity sector by 2030; reducing emissions from 10.5 million tonnes of carbon dioxide equivalent (MtCO₂ eq.) in 2018 to 3 MtCO₂ eq.



Sectoral Emission Ceiling

Emissions reduction target of 40% (residential) and 45% (commercial and public) required of Built Environment sector by 2030; reducing emissions cumulatively from 9 MtCO₂ eq. in 2018 to 5 MtCO₂ eq.



02. Built Environment

Key Takeaways

Fossil fuel use for heating buildings to be eliminated through a switch to electric heat pumps and improved insulation – installing 400,000 heat pumps and retrofitting 500,000 homes.

Carbon intensity of construction to be lowered through increased use of low-carbon materials.

District heating to improve heating efficiency; replacing individual boilers with one large community boiler.

4 Key Areas

01 Decarbonising Existing Buildings

Phase out fossil fuels in buildings by 2050.

Decarbonise heating in commercial buildings.

Lower heat demand by changing consumer behaviour.

02 Promoting Low-Carbon Construction

Increase low-carbon materials and technologies in construction and renovation.

Review and strengthen standards for new buildings and renovations.

Install 200,000 heat pumps in new residential buildings.

03 District and Geothermal Heating

Deliver up to 2.7TWh of district heating¹. Equivalent of ~125,000 homes.

Develop geothermal heating policy.

04 National Retrofit Plan

Deliver the equivalent of 500,000 retrofitted homes (to a Building Energy Rating (BER) of B2 or higher).

Install 400,000 heat pumps in existing homes by the end of 2030.

What does this mean?

For Citizens



- Free energy upgrades for homeowners receiving certain welfare benefits (e.g. Job Seekers Allowance, One-Parent Family Payment, Disability Allowance).
- SEAI grants available for heat pumps and insulation work.
- District heating networks will result in instant hot water and improve BERs.
- Residential retrofit low-cost loan (3-3.5%) available from Q3 2022.

For Communities



- SEAI's Community Grant delivers retrofits and energy saving projects to communities. Upgrades can take place across building types (homes, community buildings, businesses) but must be community-oriented.

For Enterprise



- SEAI's Support Scheme for Renewable Heat will support up to 30% of the installation costs for new heat pumps².
- SEAI's EXEED grant scheme supports large energy investment projects, including new design projects, major renovations, and major energy upgrades of existing buildings and assets.

¹ Exact level to be confirmed in National Heat Study.
² Additionally, newly installed biogas and biomass boilers will be financially supported for 15 years to ensure economic viability.



03. LULUCFM

Key Takeaways

Afforestation of farm, private and public land important for increased carbon sequestration.

Improved management and carbon sequestration of peatlands, grasslands and marine environments will reduce net emissions.

Improved biodiversity in all biospheres is a key objective of LULUCFM measures.

4 Key Areas

01 Forestry

Increase annual afforestation rate.

Encourage planting of specific tree species to balance climate mitigation and biodiversity requirements.

Support the use of timber as a material for biofuels, construction and the biomass sector.

02 Agricultural Lands

Manage the chemical composition of soils to promote soil health and carbon sequestration.

Improve tillage practices and technology.

Increase the number of hedgerows and trees on farms, and improve carbon sequestration of hedgerows.

03 Marine Environment

R&D into marine climate change impacts, blue carbon, and seaweed cultivation for use as livestock feed.

Increase monitoring and management of marine environments.

Improve sustainability of seafood industry.

04 Peatlands and Wetlands

Intensify efforts to rehabilitate peatlands.

Improve biodiversity protection and resilience in peatlands and wetlands.



For All

- Department of Agriculture, Food and the Marine offers grants and annual premiums (up to €6,220 and €680 per h/a, respectively) for establishing new forests and woodlands¹.



For Enterprise

Forestry

- Significant, rapid increase in afforestation rates required to increase carbon sequestration.
- Forestry Industry currently working towards targets in Forestry Programme 2014-2020 (extended to end of 2022), with new the Programme due to be released in 2023.

Farming

- Farmers will be further incentivised to establish and maintain small native forests on their land².
- Improvements to tillage practices, including incorporating straw to increase soil organic carbon levels.

Fishing

- Seafood Development Programme 2021-27 due to be launched later in 2022 with aims to:
 - Support conservation of fish stocks, protection and restoration of marine habitats and biodiversity.
 - Support climate change mitigation and adaptation in the seafood sector.

Construction

- Government to support development and use of timber and harvested wood products in construction industry.



Sectoral Emission Ceiling

Climate Advisory Council suggests 58% reduction of Land Use, Land Use Change, Forestry, and Marine (LULUCFM) emissions by 2030, from 4.8 to ~2 MtCO₂ eq. Finalising the sectoral emissions target was deferred for 18 months in July 2022.

¹ Afforestation & Grant Premium Scheme 2014-2020, extended to end of 2022.
² See Agriculture Highlights.



Sectoral Emission Ceiling

Emissions reduction target of 50% required of Transport sector by 2030; reducing emissions from 12 MtCO₂ eq. in 2018 to 6 MtCO₂ eq.



04. Transport

Key Takeaways

Shift from internal combustion engine to electric vehicles – 845,000 EVs on the road by 2030.

Expanded rail services; improved capacity and frequency of public transport; increased cycling investments and pedestrianised city centres.

Reduced combustion engine vehicle kilometres and increased proportion of biofuel in fuel blends.

4 Key Areas

01 Sustainable Mobility

Provide for an additional 500,000 daily public transport and active travel journeys. Major projects:

- Expand bus services and infrastructure.
- Expand rail services and infrastructure.
- Significant increase in walking and cycling investments.

02 Fleet Electrification

Increase the fleet of EVs and low emitting vehicles (LEVs) on the road to 945,000, comprising:

- 845,000 electric passenger cars.
- 95,000 electric vans.
- 3,500 low emitting trucks.
- 1,500 electric buses.
- Expanded electrified rail network.

03 System Efficiency and Demand Management

Develop the required infrastructural, regulatory, engagement, planning, innovation and financial supports for improved system, travel, vehicle and demand efficiencies.

Reduce internal combustion engine vehicle kilometres by ~10% compared to present day levels.

04 Fuels

Raise the blend proportion of biofuels from B4.5 to B20 in diesel and from E5 to E10 in petrol.

Figures correlate to the % of biofuel in respective fuels. i.e. B4.5 is 4.5% biofuel, 95.5% diesel.



What does this mean?

For Citizens & Communities

Walking & Cycling

- Additional walking and cycling infrastructure.

Public Transport - Bus

- All buses replaced by electric vehicle (EV) buses by 2035.
- Increased number of routes and frequency of buses nationwide.
- New bus payment system that allows use of cards and phones.

Public Transport - Rail

- Expand rail services and infrastructure in and around urban centres.
- Increase length of the electrified rail network from 50km to 150km by 2030. Driven by DART+ project.
- Commence delivery of Metro Link post-2023.

Internal Combustion Engine (ICE) Vehicles

- Transition away from fossil fuel tax subsidies.
- Increase in diesel excise rates to match petrol.
- Rollout of variable speed limits on the M50.

Battery Electric Vehicles (BEVs)

- SEAI provides €5,000 towards purchase of new BEVs, and up to €600 for an EV home charger unit (typically cost up to €1,500).
- Mandatory installation of EV charging stations in homes.
- Vehicle Registration Tax relief of up to €5,000 for BEVs. BEVs qualify for lowest band of motor tax at €120 per annum.
- Toll reductions of 50% for BEVs, and 25% for plug-in hybrids.



For Enterprise

- Employees pay no tax on EVs provided to them by their employer.
- Mandatory installation of EV charging stations in offices.



Sectoral Emission Ceiling

Emissions reduction target of 75% required of Electricity sector by 2030; reducing emissions from 10.5 million tonnes of carbon dioxide equivalent (MtCO₂ eq.) in 2018 to 3 MtCO₂ eq.



05. Enterprise and Industry

Key Takeaways

SEAI and Enterprise Agencies to provide grants and supports for businesses to decarbonise.

Decarbonising heating used in manufacturing and processing through renewable gases, electrification of alumina manufacturing and low-temperature heating in food and drink sector.

Increased cost of emitting and new regulations to incentivise emission reductions.

4 Key Areas

01 Decarbonise Manufacturing

Overarching aim to decarbonise the heating required in manufacturing.

Plan to inject renewable gases into the gas grid, decarbonising combustion.

Hybrid gas-electric heating for alumina manufacturing.

Agri-food €100m Capital Investment Fund; focuses on more sustainable processing.

02 Emissions Trading Scheme (ETS) and Carbon Pricing

Within the EU ETS, the cap on allowed emissions will be reduced. Emissions outside of this cap are subject to the ETS market price.

The price of carbon is legally required to rise from €41/tCO₂ today to €100 by 2030.

03 SEAI and Enterprise Agency Leadership

Grant programmes to:

- Support decarbonisation of manufacturing and construction.
- Improve energy efficiency.

Enterprise Ireland's 'Offshore Wind Industry Cluster' is a group of Irish companies who will develop offshore wind.

04 Regulations

Reduce emissions of fluorinated greenhouse gases by 80% by 2030 from 2014 levels based on EU regulation.

License fuel-switching (e.g. hybrid gas-electric).

Renewable Heat Obligation; heat suppliers must source a growing % of heat from renewables.

What does this mean?



For Citizens & Communities

- Implementation of Green Gaeltacht project, includes supporting renewable processes in Údarás na Gaeltachta's client companies.
- Promotion and marketing of sustainable tourism.



For Enterprise SMEs

- SEAI offer SMEs a €2,000 voucher towards energy audit costs.

Large Enterprise

- SEAI's Energy Auditing Compliance Scheme provides guidance to businesses needing to complete energy audits under EU law.
- Any entity with an annual energy spend of >€1m will be supported by the SEAI's Large Industry Energy Network to improve energy performance.

All Enterprise

- Manufacturing of alumina and other energy-intensive goods will become more expensive unless emissions are reduced.
- Carbon taxes will rise by €7.50 every year to 2030, increasing the price of fossil fuels.
- Free energy efficiency training for businesses provided by SEAI.
- SEAI's EXEED grant supports large energy investment projects (up to €1m per project).
- SEAI's Accelerated Capital Allowance (ACA) allows businesses to deduct the cost of energy efficient equipment from profits.¹
- Enterprise Ireland and IDA offer grants for sustainability consulting services (up to €900/day). IDA additionally provides grants for renewable energy projects e.g. combined heat and power generation.
- Grants provided for businesses to develop circular solutions to product and service design, reducing waste (up to €100,000 per grant) through EPA's Green Enterprise Scheme.

¹: Any entity that pays corporation tax is eligible.



06. Agriculture

Key Takeaways

Reducing emissions by:

- Limiting the use of chemical nitrogen.
- Increasing land dedicated to organic farming fivefold.
- Increasing investment in R&D.

Cattle emission reductions driven by breeding improvements and lowering of slaughter age.

4 Key Areas

01 Reducing the Emissions on our Farms

Reduce annual chemical nitrogen usage on Irish farms from peak of 408k tonnes to <325k tonnes by 2030.

Reduce livestock-related emissions through improved breeding, lower average slaughter age and changing composition of feedstuffs.

Increase organic farmland from 74k to 350k hectares by 2030.



For Citizens & Communities

Current actions omit measures that specifically target Citizen and Community action (e.g. encouraging more sustainable consumption).



For Enterprise

Farmers

- Conditionality Requirement. Farmers must meet certain environmental standards to qualify for any of the below payments. These standards target soil, habitat and water quality, climate adaptation, and animal health.
- Voluntary Agri-environment and Climate Scheme. Farmers paid €5,000 –7,000/yr for implementing biodiversity and habitat quality measures.
- Voluntary Eco-scheme. Farmers paid €66 –90/ hectare/yr if they deliver 2 of 8 environmentally-beneficial practices. These include: limiting chemical nitrogen usage, dedicating more land to nature, reducing animals per hectare and planting less intensive crops.
- Suckler Carbon Efficiency Program. Beef farmers paid additional €180-225/hectare if 80% of calves come from more efficient parents, as rated by the Irish Cattle Breeding Federation.
- Organic Farming Scheme. Farmers paid €250 –600/hectare/yr when converting to organic, and €170 –400/hectare/yr when converted. Rate depends on farm type.

Agri-Food Enterprises

- Capital Investment Fund - Avail of Enterprise Ireland's €100m fund to develop new products and processes underpinned by sustainable production (at farm and processor level).
- Reduce supply chain (farm) emissions by supporting farmers to implement the above measures, enabling the demonstration of action to customers through carbon reporting and labelling.
- Recognise Climate Risk - Agriculture is particularly vulnerable to climate change impacts. Factor in to decision-making.

02 Adaptation

Build climate resilience in the agriculture, forest and seafood sectors.

Educate and train farmers with the knowledge and tools to implement climate mitigation and adaptation practices.

03 Agriculture and Research

Improve Research and Development in the agriculture sector, with particular focus on organic farming, feed improvement, and international collaboration.

Establish a centre of excellence for innovation in climate-smart agriculture.

04 Further Measures to Reduce Emissions and Increase Removals

Improved grants for farmers to make investments in renewable energy.

Improve knowledge transfer and education programmes for farmers.



Sectoral Emission Ceiling

Voluntary emissions reduction target of 25% required of Agriculture sector by 2030; reducing emissions from 23 MtCO₂ eq. in 2018 to ~17.25 MtCO₂ eq.



07. Circular Economy

Key Takeaways

Bioeconomy research, development and innovation grants available for businesses.

Waste measures are focused primarily on preventing waste ahead of recycling and re-use.

Increased regulation and research in the mineral exploration and mining sector.

4 Key Areas

01 Governance of the Circular Economy

Policies and strategies to encourage the transition towards a Circular Economy.

Reduce economic, social and regulatory barriers to Ireland's transition to more circular economy.

Make Circular Economy practices a statutory requirement through the Circular Economy Bill 2021.

02 Bioeconomy Measures

Part of the economy which uses, renewable, biological resources (e.g. crops) to produce food, products and energy while also reducing waste.

Three-year action plan for bioeconomy to be published Q3 2022.

Increase innovation and upskill workforce in sector.

Future CAPs to provide greater detail on bioeconomy strategy.

03 Mineral Exploration Measures

Measures to reduce primary resource extraction in favour of recycled metals and minerals.

Draft Policy on Mineral Exploration and Mining published. The policy aims to:

- Build public understanding and trust of the mining sector.
- Enhance regulations.
- Support research into the role of minerals in the transition to net zero.

04 Waste Measures

Develop food waste prevention roadmap and improve segregation of food waste.

Increase environmental levies to incentivise greater re-use and recycling and reduce resource consumption.

Regional Waste Management Plans published Q1 2022.



What is the Circular Economy?

“The Circular Economy is an alternative model to the ‘take-make-waste’ model of production and consumption... It seeks to keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of life.” (DECC, 2021)

What does this mean?

For All

- Circular Economy Programme 2021-2027 includes education and awareness programme to educate all levels of society about the transition to the Circular Economy.
- National Waste Prevention Programme centred on reducing waste in: food, plastics, agriculture, local waste, resources and raw materials, and construction and demolition.
- Draft National Food Waste Prevention Roadmap indicates need for all sectors to change food waste patterns to achieve targets.

For Communities and Enterprise

- Irish Bioeconomy Foundation supports bioeconomy businesses; providing access to a bioprocessing facility, financing, and promotion and outreach opportunities.
- Research, Development and Innovation Supports available from EI, IDA Ireland, DECC and the EPA. Grants available from 8-100% of project costs.
- Lean, Operational Excellence and Digitalization supports available for EI, Údarás, IDA and LEO clients. Grant sizes and intensity vary (up to €300,000 project costs; 10 –100% funded).
- Regulation of mineral exploration and mining to become more robust. e.g. The State will not issue prospecting licences, mining licenses or leases for coal, lignite and oil shale.
- Food producers and businesses encouraged to measure and record food waste data.



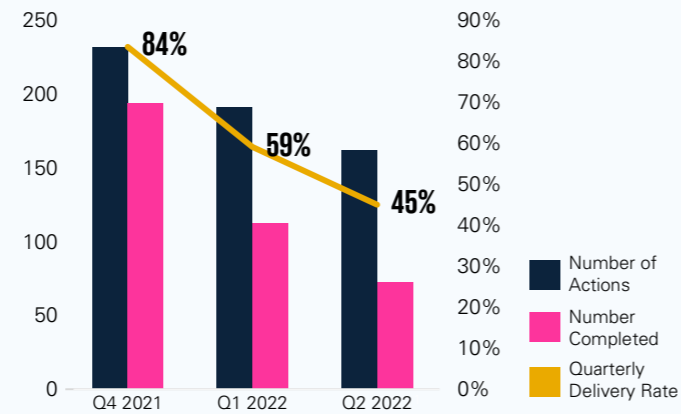
Sectoral Emission Ceiling

Climate Advisory Council suggests 14% reduction of Circular Economy emissions by 2030, from 0.91 MtCO₂ eq. to 0.77 MtCO₂ eq. Also by 2030: Reduce food waste by 50%, ensure that all plastic packaging is reusable or recyclable; increase capacity to recycle packaging waste by 70%, and plastic package waste by 55%.

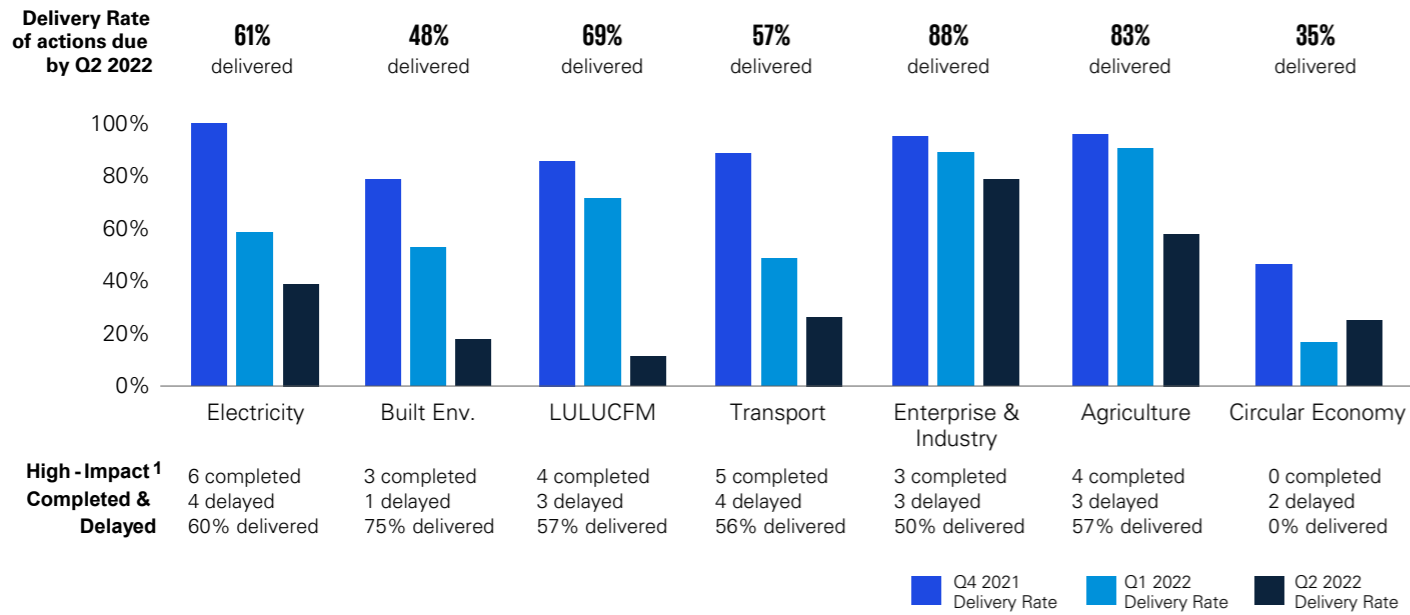
CAP21 Progress

Entities tasked with the delivery of the CAP21 actions reported a delivery rate of 84% in Q4 2021 and 59% in Q1 2022 and signals a decline in quarterly implementation rates. The cumulative delivery rate up to Q2 2022 sits at 71% and is falling, which may result in Ireland missing its emission reduction targets.

Delivery Rate Trends



Sector Progress



The three top reasons² for delay, in order of impact and responsible for nearly 50% of the delays:

- Consultation efforts, including both the need for stakeholder consultation for inclusive policymaking and the subsequent analysis of submissions that prove to be unexpectedly voluminous, complex or lengthy;
- Capacity and Capability constraints, including delays arising from civil service reliance on external expertise, competing work priorities (particularly in energy and housing) and difficulties in recruitment and resourcing;
- Desires for alignment with other policies, programmes and funds related to climate action for reasons of increasing measure effectiveness, efficiency or impact.

¹ As stated in Climate Action Plan 2021 Progress Reports, High Impact Measures are those that hold significant emissions reduction and/or adaptation potential.
² Climate Action Plan, Progress Report Q2 2022; June 2022

Supporting Organisations to Decarbonise



Define ESG maturity & ambition level

The Climate Action Plan 2021 may present significant challenges to Irish enterprise

- Irish organisations have three potential strategic responses: maximise opportunities, adapt and overcome or eliminate existential threat.
- Businesses need to define what their ambition and maturity level is regarding ESG and decarbonisation.

Strategy & Change Levers

Maximise Opportunities
 The Climate Action Plan 2021 offers significant growth and development opportunities for the business: it is important to respond decisively at pace.

Adapt & Overcome
 A clear action plan is required to pro-actively respond to the Climate Action Plan 2021: changing operations to be more efficient will ensure continued success.

Eliminate Existential Threat
 Ignoring the implications of the Climate Action Plan 2021 or delayed response to the Climate Action Plan will have a significant negative impact: urgent need for a strategic review and analysis.





Want to Know More?



KPMG
Sustainable
Futures



See how KPMG can help – insights from KPMG and KPMG's Sustainable Futures team, highlighted here:



Renewable energy key to Irish climate action

26 April 2022

11 min read

Decarbonising Ireland's energy is a big opportunity for businesses.



The Circular Economy

08 March 2022

9 min read

How it will play a vital role in the Climate Action Plan 2021.



Land, Forestry & Ireland's Climate Action

22 February 2022

4 min read

What is LULUCF and what does it mean for your business?



Transforming Transportation

02 June 2022

6 min read

Embracing technological change key to decarbonising public transport.

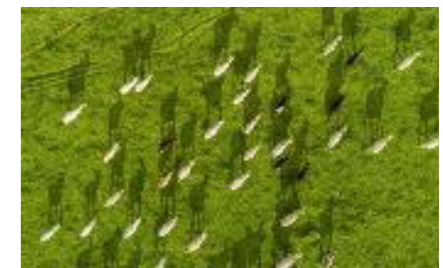


Preparing for the Climate Action Plan

16 December 2021

5 min read

What your business needs to do to get to net zero.

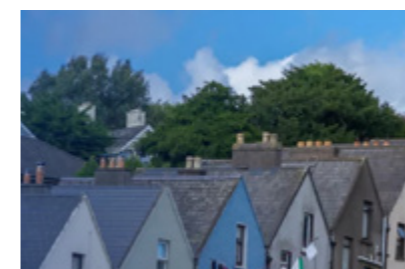


Climate Action Plan - Agriculture

24 March 2022

8 min read

Decarbonising the agri sector.



Decarbonising Our Built Environment

19 September 2022

7 min read

Reflecting on the Climate Action Plan and decarbonising the built environment.

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