

Minister Darragh O'Brien
Department of Climate, Energy and the Environment
Tom Johnson House,
Haddington Road,
Dublin 4, D04 K7X4

20th July 2026

Re: Just Transition Commission's Recommendations for the Update of Climate Action Plan 2026

Dear Minister O'Brien,

The Just Transition Commission is an independent body established by Government to support Ireland's transition to the National Climate Objective in a manner that has regard to the requirement for a just transition to a climate-neutral economy. Under its Terms of Reference, the Commission is mandated to evaluate, advise on and comment on the planning, implementation and progress of national and sectoral climate policies, and to provide strategic advice to Government on the application of Ireland's Just Transition Principles across climate policy. The Commission also has a specific role in assessing the extent to which climate action policies reflect Ireland's Just Transition Policy Framework and advising on opportunities to strengthen the application of these principles. This submission is made in accordance with that advisory remit to inform the preparation of Climate Action Plan 2026 (CAP26).

Representing business, agriculture, community and voluntary, trade union, environmental and wider interests, the Commission recommends that CAP26 **lists just transition as a priority objective and establishes the expectation that future Climate Action Plans and related policy systematically integrate Just Transition Principles across all sectors. This recommendation reflects the Commission's role in advising Government on the planning and implementation of climate policy and on strengthening the integration of Just Transition Principles into national and sectoral climate policies.**

Government has already committed to delivering a just transition. Ireland has adopted a Just Transition Policy Framework, successive Climate Action Plans have committed to applying Just Transition Principles, and the establishment of the Commission itself reflects Government's recognition that the transition to climate neutrality must be fair and inclusive. The issue is therefore no longer whether just transition should underpin climate policy, but whether Government is giving practical effect to that commitment.

The Commission's assessment is that, despite these commitments, Just Transition Principles are not yet being systematically applied across the development, implementation and evaluation of climate policy. While many climate policies deliver important social and economic benefits, Government currently has no consistent framework to demonstrate whether climate action is being delivered in accordance with its just transition commitments, or whether the costs and benefits of the transition are being shared fairly across society.

CAP26 should mark the point at which Government moves from committing to a just transition to demonstrating how that commitment is being delivered. It should move beyond a statement of intent and establish just transition as a strategic objective that informs how climate policy is designed, delivered and evaluated. CAP26 should signal that Government's commitment to a just transition is no longer aspirational, but will be embedded within the governance of climate action, supported by clear responsibilities, evidence and accountability.

The climate crisis is intensifying, with impacts already being felt across all parts of society. Those impacts are not experienced equally. Where someone lives, their job, age, gender, socioeconomic status, and mobility all shape both their exposure to climate impacts and their ability to participate in and benefit from the transition.

The opportunity is now to plan for a just transition as the means by which Ireland delivers climate action in a way that is socially sustainable, economically resilient and publicly supported. A just transition is not an additional consideration alongside climate action; it is the approach Government has committed to taking in delivering the transition to climate neutrality.

In addition to the climate impact, the ongoing impact on energy prices from recent wars highlights the risks and vulnerabilities within our society and economy of continued reliance on fossil fuels, and the unequal nature of impacts. These pressures further reinforce the need for climate policy that deliberately protects vulnerable households and communities while enabling the transition to a competitive, low-carbon economy.

Just transition as a priority objective of Climate Action Plan 2026

Climate Action Plans have recognised that a just transition seeks to maximise the social and economic opportunities arising from climate action while supporting those who may be negatively affected. While this provides an important foundation, the Commission considers that the definition developed by the Just Transition Taskforce provides a more comprehensive basis for climate policymaking because it sets out not only the intended outcomes of a just transition, but also the principles through which it should be delivered.

The Just Transition Commission therefore supports the definition of just transition developed by the Taskforce, and agreed by the five Pillars of social dialogue, which recognises that:

“A just transition will build a better future for all and ensure no-one is left behind. This will be achieved through social dialogue, promoting decent living standards, and proactive planning to anticipate change. It will support and develop sustainable and quality jobs and employment opportunities, reskilling and training. Through investment in services, infrastructure and social protection, people and communities that may be affected by this transition will be supported in a manner that is inclusive, equitable and fair.”¹

This definition reflects the Commission's view that a just transition is not simply about

¹ Department of Environment, Climate and Communications (2024) *Report of the Taskforce on Just Transition*
<https://assets.gov.ie/static/documents/report-on-the-taskforce-on-just-transition.pdf>

managing the negative impacts of climate policy. It is a framework for delivering climate action in a way that improves people's lives, reduces inequality, strengthens resilience and ensures the benefits and burdens of the transition are shared fairly across society. Climate action and social progress should therefore be pursued together, with fairness embedded as a core principle of climate governance rather than treated as a separate or parallel objective.

A just transition will not happen on its own. It must be planned, supported, embedded and enabled across all areas of climate action. Delivering a just transition requires governance that is coordinated, transparent and accountable. Fairness must be intentionally designed into climate policy from the outset through evidence-based decision-making, meaningful participation and clear accountability for outcomes.

The Commission notes that previous Climate Action Plans included dedicated chapters on just transition, including a chapter focused on the Midlands region. These chapters recognised the importance of fairness and represented an important step in establishing just transition within Ireland's climate policy framework.

However, this approach has also reinforced the perception that just transition is a standalone policy issue, rather than a cross-cutting principle that should inform all aspects of climate action. Treating just transition as being separate from climate action risks confining considerations of fairness to a limited set of actions or regions, rather than ensuring that every climate policy is designed, implemented and evaluated through a just transition lens.

While the Midlands has rightly received dedicated support in response to the ending of peat extraction, the just transition extends far beyond the region. Workers, households, businesses and communities across Ireland will experience the impacts of climate policy differently. Policies relating to housing, transport, agriculture, land use, energy, enterprise, skills and adaptation all have distributional impacts that should be considered through a just transition policy framework.

CAP26 should therefore move beyond treating just transition as a standalone issue from climate action or as a regional programme. While recognising that the full integration of just transition across all sectors will take time, CAP26 should establish just transition as a strategic objective of climate action and clearly signal that future Climate Action Plans will systematically apply Ireland's Just Transition Principles across all sectors and policy development.

Building on these findings, the Commission recommends that CAP26 includes the following actions to embed fairness as a defining feature of Ireland's climate transition.

- ❖ **Just transition is listed as a priority objective of CAP26** and establishes the expectation that future Climate Action Plans and related climate policy systematically integrate Just Transition Principles across all sectors.
- ❖ **Adoption of the updated national definition of just transition within CAP26**, as developed by the Just Transition Taskforce and supported by the Just Transition Commission. This definition should be applied consistently across CAP26 and future climate policy to establish a shared understanding that a just transition is a whole-

of-society approach to climate action, delivered through proactive planning, social dialogue, decent living standards, quality employment, investment in people and communities, and a commitment to ensuring no one is left behind.

- ❖ **A commitment to deliver the National Just Transition Strategy.** The Commission welcomes the Government's commitment to develop a National Just Transition Strategy. CAP26 should reaffirm this commitment and position the Strategy as the overarching framework for embedding just transition across climate policy. The Strategy should articulate Government's long-term vision for a just transition, clarify responsibilities across Government, and become the strategic framework from which future Climate Action Plans are developed.

The development of the Strategy also provides an opportunity to progress several important just transition commitments that have yet to be delivered, including the development of a policy toolkit to support Departments in applying Ireland's Just Transition Principles and the establishment of a national framework of just transition indicators. Together, these will provide the practical guidance, governance and evidence needed to move from commitment to implementation and enable Government to assess whether climate action is being delivered fairly.

The National Just Transition Strategy should ensure that just transition is embedded across all areas of climate action, moving beyond a focus solely on energy transition alone, reactive interventions and siloed approaches. It should identify those most vulnerable to climate action, demonstrate how the transition will improve social, economic and environmental wellbeing, and establish clear governance and accountability arrangements to support implementation.

- ❖ **A commitment to continued learning from just transition programmes** must be demonstrated in order to inform new regional and national programmes and policies and for the development of a nationwide approach to just transition. The Midlands represents Ireland's first large-scale experience of implementing a dedicated just transition programme. The lived experiences of affected workers, businesses and communities, together with evidence on employment, skills, wellbeing, community engagement, social dialogue, community resilience and quality of life, should be systematically evaluated to inform future place-based transition policies.

Other major climate programmes including housing retrofit, transport investment, energy supports and agri-environment schemes already contain significant just transition elements but are not systematically assessed against just transition outcomes. Within the agriculture sector for example there are a range of transition aligned programmes encouraging diversification activities, such as forestry and renewable energy and the potential for new programmes aligned with climate action plans or the Nature Restoration Regulation. Government should evaluate whether these programmes, and any new transition programmes are reducing energy poverty, improving health and wellbeing, creating sustainable livelihoods, increasing access to opportunity and supporting those most affected by climate action, rather than reporting solely on programme outputs such as the number of

grants awarded or homes retrofitted.

Future policy and investment decisions should be guided by robust socio-economic evidence to ensure climate action improves outcomes for the people and communities most affected by the transition. This requires a stronger evidence base on who bears the costs of climate policies, who benefits, which regions and sectors are most exposed, and where new employment opportunities are emerging, so that fairness is built into policy design rather than considered retrospectively.

Designing, implementing and monitoring just transition objectives

A just transition must guide how policies are developed, implemented and monitored. Delivering a just transition requires more than policy commitments; it requires governance arrangements that ensure fairness is considered throughout the design, implementation and evaluation of climate policy. All climate action measures should be robustly critiqued to ensure fairness, equality and access to opportunity are improving alongside reducing greenhouse gas emissions. Reducing emissions and delivering a fair transition are complementary objectives and should be monitored with equal rigour.

The development of a National Just Transition Strategy, as recommended above, should strengthen the integration of just transition across climate policy. However, the Commission's work has identified three persistent challenges: limited integration of just transition across Government, an underdeveloped socio-economic evidence base, and the absence of indicators and targets to assess whether climate policy is delivering fair outcomes. Ireland has developed sophisticated systems to monitor emissions and progress towards carbon budgets. No comparable framework exists to assess who benefits from climate action, who bears its costs, whether inequalities are being reduced, or whether communities most affected by the transition are experiencing better outcomes. Without this evidence, Government cannot demonstrate whether its commitment to a just transition is being achieved.

The Commission welcomes the initial work undertaken to develop a national framework of just transition indicators. Progress has slowed due to constraints, delaying the establishment of a comprehensive framework for measuring outcomes. This reinforces the need for CAP26 to prioritise the completion of the indicator framework and ensure it is adequately resourced. In the meantime, Government should make greater use of existing national datasets to assess whether climate action is delivering fair social and economic outcomes.

Despite the known evidence gap, an analysis of many existing macro indicators and datasets could be undertaken to gain a greater understanding of whether just transition objectives are being achieved. For example, the Well-being Framework² provides a high-level holistic overview of how Ireland is doing, economically, environmentally and socially. Combined with existing indicators such as poverty (including vulnerable groups such as

² Ireland's Well-being Framework is a cross-government initiative to help improve our understanding of quality of life and to measure how we are progressing overall as a country. The Central Statistics Office host a dashboard that provides up to date information on 35 well-being indicators <https://www.cso.ie/en/index.html>

children), deprivation, unemployment, educational participation and energy poverty, Government could begin to assess whether climate action is improving wellbeing and reducing inequality alongside reducing emissions.

The distribution of climate policy impacts should also be assessed geographically. Applying a regional lens to national policies such as housing retrofit, investments in public transport, or agri-environmental schemes would indicate whether climate policies are lifting communities out of poverty and deprivation or not.

Taking retrofit policy as an example, it is well understood that housing retrofit can serve to reduce energy bills and improve comfort and living conditions along with reducing emissions. However, while the number of homes retrofitted is routinely reported on and tracked, Government does not systematically assess whether retrofit policy is reducing energy poverty, improving health and wellbeing, lowering household energy costs or improving living standards for those most vulnerable. Measuring these wider outcomes is essential if Government is to demonstrate that climate action is delivering a just transition, rather than assuming these benefits are occurring.

CAP26 should therefore strengthen climate governance by ensuring that the social and economic outcomes of climate policy are monitored alongside emissions reductions. This will provide Government with the evidence needed to improve policy over time, strengthen public confidence and demonstrate that climate action is delivering fair outcomes across society.

The Commission recommends the following actions are included in CAP26.

- ❖ **Adequately resource the implementation of just transition across Government.** The Commission recognises the progress made to date in developing governance arrangements and the commitment to the development of a National Just Transition Strategy. However, progress has slowed due to resource constraints. The successful implementation of just transition cannot rely on limited capacity within a small number of teams. As a whole-of-government objective, it requires dedicated policy, analytical and implementation expertise to support multiple Departments in applying the Just Transition Principles consistently across sectoral climate policies. CAP26 should commit the resources necessary to complete the National Just Transition Strategy, finalise the national indicator framework, develop practical implementation tools for Departments, and strengthen the governance arrangements needed to monitor progress and drive continuous improvement.
- ❖ **Strengthen climate governance to support the implementation of just transition.** Rather than creating new structures, existing governance arrangements should be strengthened. This should include:
 - Dedicated just transition policy expertise within the Department of Climate, Energy and Environment to support Departments in applying Ireland's Just Transition Principles across policy development;
 - An expansion of the Climate Action Unit within the Department of An Taoiseach to include measuring progress against just transition indicators, alongside its existing oversight of Climate Action Plan delivery; and

- Publishing a Just Transition Assessment alongside the quarterly Climate Action Plan Progress Reports.³
- ❖ **Complete and implement a national framework of just transition indicators.**
The indicator framework should be adequately resourced and completed as a priority. The indicators should measure social, economic and regional outcomes alongside emissions reductions and be used to inform policy improvements where intended outcomes are not being realised.
- ❖ **Use macro data to assess trends.** Using available macro data to assess the impact of climate policies on well-being, inequality, employment and poverty would contribute to a greater understanding of the transition. This could include analysing indicators from the Well-being Framework, poverty (including vulnerable groups such as children) and deprivation indices, and rates of energy poverty to assess nationwide progress towards a more just society. Introducing new questions to the forthcoming census would be a prime opportunity to collect additional data on just transition trends.
- ❖ **Improve data collection within climate programmes to enable better analysis.**
Climate programmes should routinely collect information on participants' socio-economic characteristics and geographic distribution to better understand who is, and is not, benefiting from public investment and to identify where barriers to participation exist, for example, housing retrofit grants, electric vehicle grants, agri-environment schemes etc.
- ❖ **Develop just transition targets for future Climate Action Plans.** Future Climate Action Plans should establish just transition targets alongside greenhouse gas emissions targets. This will provide Government with a clear framework for monitoring whether climate action is delivering fair outcomes and ensure that environmental and societal progress are measured with equal importance.

Participation and dialogue

Facilitating dialogue on climate change and climate action with a diverse range of stakeholders is an essential element of the just transition process.

The Commission is tasked with strengthening the local and community dimensions of just transition and strengthening engagement with vulnerable cohorts as part of Ireland's climate engagement activities.

Meaningful participation is fundamental to delivering a just transition. Climate policies are more likely to be effective, trusted and durable when the people most affected have genuine opportunities to shape decisions. A just transition cannot be delivered to people and communities; it must be developed with them through ongoing dialogue, shared

³ Reports on progress against actions listed in the Climate Action Plan Annex of Actions, are published quarterly and subject to scrutiny by the Climate Action Delivery Board, the Cabinet Sub Committee on Climate Action and the public. Reports are published here <https://www.gov.ie/en/department-of-the-taoiseach/publications/climate-action-plan-progress-reports/>

learning, capacity building and meaningful participation in decision-making.

Through its engagement programme, the Commission has consistently found a willingness among communities, workers, businesses and civil society to participate in shaping Ireland's climate transition. However, stakeholders also expressed concerns about consultation fatigue, limited feedback on how their views influence policy, and a lack of visible pathways from engagement to decision-making. Participation must therefore move beyond consultation towards more structured and consequential dialogue that demonstrably informs climate policy.

The Commission welcomes its role in supporting the National Dialogue on Climate Action,⁴ and welcomes the evolution of the National Dialogue from a communications and awareness initiative towards a mechanism for public participation in climate policymaking. This represents a significant opportunity to strengthen trust, improve policy design and ensure that the experiences of affected communities are reflected in national decision-making.

While the consultation for CAP26 has relied primarily on an online questionnaire, future Climate Action Plans should be informed through more deliberative and participatory processes that actively engage communities, workers, businesses and those most affected by the transition. Embedding meaningful participation within the climate planning cycle will strengthen both the quality and legitimacy of climate policy.

The Commission recommends that CAP26 recognises the importance of participative and accessible consultation on climate action and just transition with diverse audiences. This includes;

- ❖ **Recognise the National Dialogue on Climate Action as the Government's principal mechanism for participatory engagement on climate policy** and use the opportunity provided through the NDCA to establish a facilitated structured dialogue to inform the preparation of future Climate Action Plans, moving beyond consultation towards meaningful participation in policy development.
- ❖ **Support the continued development and resourcing of the National Dialogue on Climate Action** to ensure participation is accessible, inclusive and representative, particularly for communities, workers and vulnerable groups most affected by climate action. Participation should include clear feedback mechanisms so contributors understand how their engagement has influenced policy outcomes.
- ❖ **Sectoral dialogues should be undertaken** to examine the workforce impacts of climate action. In line with the recommendation by the National Economic and Social Council,⁵ the Commission recommends that the Agriculture and Land Use

⁴ The National Dialogue on Climate Action is the Government's primary for public engagement on climate action. The dialogue is structured to gather public opinion and promote local initiatives and community climate actions. Secretariat support is provided by the Environmental Protection Agency. <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-dialogue-on-climate-action-ndca/>

⁵ In their report No. 162, Just transition in Agriculture and Land Use, The National Economic and Social Council state *"The starting point for the ambitious transition that is required is a vision that all stakeholders can agree to work collectively towards. The journey towards this vision must be underpinned by a commitment to continuous learning and will be supported by a just transition process focused on a transition within, not out of, agriculture. (NESC) identifies the benefit of an inclusive engagement process to develop and deepen a sense of shared purpose for the sector's transition based upon clear, coherent and consistent communications."* https://www.nesc.ie/app/uploads/2023/06/162_just_transition_in_ag_land_use-1.pdf

sector should be the first sector to undertake a structured national just transition dialogue, recognising both the scale of change anticipated within the sector and the importance of building a shared long-term vision with those directly affected.

- ❖ **Institutionalise national climate dialogue.** Similar to the National Economic Dialogue, Government should establish a recurring National Climate Dialogue⁶ to provide a structured forum for deliberation on the environmental, economic and social dimensions of climate policy ahead of decisions on carbon budgets, Climate Action Plans and other major strategic policies.

Conclusion

Ireland has made a clear commitment to delivering a just transition. The challenge for CAP26 is no longer whether just transition should underpin climate policy, but how that commitment will be implemented, governed and demonstrated in practice.

The Commission's work has found that while important foundations have been established including the Just Transition Policy Framework, the National Dialogue on Climate Action, and the establishment of the Just Transition Commission, these have yet to be consistently translated into the governance, policy development and evaluation of climate action. Government has committed to just transition, but there remains no consistent mechanism to demonstrate whether climate action is being designed, implemented and monitored in accordance with those commitments. As a result, Government cannot yet demonstrate whether climate action is delivering fair outcomes for the people, workers, businesses and communities most affected by the transition.

CAP26 provides an opportunity to move from commitment to implementation. While recognising that the full integration of just transition across all sectors will be achieved over successive Climate Action Plans, CAP26 should establish the strategic direction for that transition. It should make clear that just transition is not a standalone policy issue or regional programme, but a defining principle of how climate action is planned, delivered and evaluated.

The recommendations contained in this submission are intended to support that transition by:

- ❖ establishing just transition as a strategic objective of climate action;
- ❖ adopting a common national definition of just transition;
- ❖ strengthening governance, accountability and cross-government coordination;
- ❖ improving the evidence base through indicators, data and evaluation;
- ❖ ensuring climate policy is informed by meaningful participation and social dialogue; and
- ❖ providing Government with the tools to demonstrate that climate action is improving people's lives while achieving Ireland's climate objectives.

A just transition is not an additional objective alongside emissions reduction. It is the means by which Ireland can deliver ambitious climate action in a way that is fair, trusted and enduring. Embedding just transition within the Climate Action Plan process will strengthen public confidence, improve policy outcomes and help ensure that the transition

⁶ The Just Transition Commission have proposed a National Climate Dialogue to the Minister for Climate, Energy and the Environment. The request is published on the Just Transition Commission website here <https://justtransitioncommission.ie/wp-content/uploads/2026/04/Proposal-for-a-National-Climate-Dialogue.pdf>

to climate neutrality contributes to a more resilient, inclusive and prosperous Ireland.

CAP26 should mark the point at which just transition moves from principle to practice, from a commitment that Government has made, to an approach that Government can demonstrate is shaping climate action across Ireland.

The Commission welcomes the opportunity to contribute to the preparation of CAP26 in accordance with its advisory role and looks forward to continuing to work with Government to support the implementation of a just transition across Ireland's climate policies.

Yours sincerely,



Ali Sheridan
Chair
Just Transition Commission

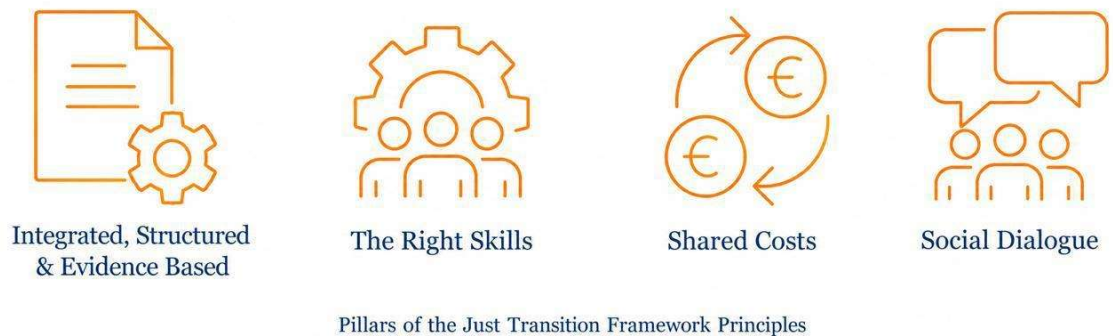
Appendix 1: Summary of the Commission's Recommendations for Climate Action Plan 2026

The table below provides a consolidated summary of the Commission's recommendations to support the preparation of CAP26.

	Recommendation
Just transition as a priority objective of Climate Action Plan 2026	List just transition as a priority objective of CAP26 and establish the expectation that future Climate Action Plans and related climate policy systematically integrate Ireland's Just Transition Principles.
	Adopt the updated national definition of just transition, as developed by the Taskforce on Just Transition and supported by the Just Transition Commission.
	Reaffirm Government's commitment to develop a National Just Transition Strategy as the overarching framework for embedding just transition across climate policy.
	Continue learning from existing just transition programmes, including evaluating the Midlands experience, to inform future regional and national policy.
	Strengthen the evidence base by evaluating major climate programmes against just transition outcomes, not solely programme outputs.

Designing, implementing and monitoring just transition objectives	Adequately resource the implementation of just transition across Government.
	Strengthen climate governance to support the implementation of just transition.
	Complete and implement a national framework of just transition indicators.
	Use existing macro-level datasets to assess progress towards a just transition while the national indicator framework is being completed.
	Improve data collection across climate programmes to better understand participation and outcomes.
	Develop just transition targets for inclusion in future Climate Action Plans alongside greenhouse gas emissions targets.
Participation and dialogue	Recognise the National Dialogue on Climate Action as the principal mechanism for participatory engagement in the preparation of future Climate Action Plans.
	Continue to support and resource the National Dialogue on Climate Action to ensure participation is inclusive, accessible and representative.
	Undertake structured sectoral dialogues on workforce transition, beginning with Agriculture and Land Use.
	Institutionalise a recurring National Climate Dialogue to inform future carbon budgets, Climate Action Plans and major strategic climate policy decisions.

Appendix 2: Ireland's Just Transition Principles Framework



Appendix 3: Relevant Just Transition Commission Publications

- Introductory Report of the Just Transition Commission of Ireland 2025
Available here https://justtransitioncommission.ie/wp-content/uploads/2025/10/JTC_Ireland_introductory_report_june_2025.pdf
- Just Transition Commission of Ireland Progress Update April 2026
Available here <https://justtransitioncommission.ie/wp-content/uploads/2026/04/April-2026-Progress-Update-Report.pdf>