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MAPPING JUST TRANSITION **INITIATIVES** ON THE ISLAND OF IRELAND

Caitlin McIlhennon

EJNI
ENVIRONMENTAL JUSTICE
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Summary

Just transition policies and initiatives act as **useful measures to address the social risks of industrial decarbonisation** with a focus on making decarbonisation socially fair and supported. In both Ireland and (more recently) Northern Ireland some progress has been made but more remains to be done to ensure a just transition to climate neutrality.

Ireland has not yet fully integrated fair transition objectives into policymaking at all levels in alignment with the Council of Europe recommendations on ensuring a fair transition towards climate neutrality.

- **The establishment of the Just Transition Commission is a positive step forward in incorporating just transition considerations in Ireland's climate policymaking** through the provision of evidence-based advice and scrutiny on government plans and policies.
- **A glaring gap remains in addressing structural causes of energy poverty** and failure to adhere to energy poverty obligations at EU level.
- Dialogue and public participation are the basic conditions for implementing a just and fair transition in national policies. **Ireland must significantly improve public participation processes and ensure inclusion of vulnerable communities in both design and implementation of these plans, in line with the Council Recommendation 23.**
- The **NECP revision process was a missed opportunity to embed a fair and just transition in Ireland's climate policy framework**. Civil society's reflection on the EU wide responses to key just transition requirements in the NECP revision process points to reform at European level. The EU Commission's formal assessment of Ireland's final NECP was clear, while some progress has been made, Ireland's current plan remains far from sufficient to meet its 2030 commitments. Lessons must be learned from the NECP revision process during the ongoing preparation of Ireland's upcoming Social Climate Plan.
- Ireland's **Social Climate Plan** acts as a key just transition initiative in its climate policy framework to deliver **tangible** social and environmental benefits for those most impacted by the costs of the green transition.
- **Ireland's climate plans and policies do not adequately consider or address the gender dimension of the green transition.** There is a noticeable lack of intersectional analysis/ approach in Ireland's JT policy.

In Northern Ireland progress has been much slower. From the experience in Ireland, it is clear that **supranational obligations under EU law play an important role in determining the direction of travel and level of progress towards a fair and just transition**. The removal of these obligations for Northern Ireland as a consequence of Brexit has played a partial role in the slow establishment of just transition initiatives in this jurisdiction. Recent developments are more positive, and **Just Transition obligations are strongly integrated in Northern Ireland's Climate Act which has real potential to enable a just and fair transition**. A recent consultation on the establishment of a Just Transition Commission as per the requirements of the NI Climate Change Act 2022 is a major step forward. However, the ongoing failure to establish specific climate governance structures mandated in the 2022 Act and the failure to adopt carbon budgets stymies cooperation across the border and limits effective engagement with parallel structures in Ireland. This has hindered the development of all-island policies reconciling environmental and social goals.

Introduction

The meaning assigned to Just Transition varies at national, EU and international levels and has evolved over time. Initially, it concerned the promotion and protection of labour rights for employees working in carbon intensive sectors.¹ In recent years, it has evolved to address various dimensions of inequality, justice and vulnerability.² A core component of the meaning of a 'just transition' includes addressing the disproportionate impacts of the transition and climate change on vulnerable communities to mitigate the risk of unequal distribution of costs and benefits.³ In addition, what has been coined the "triumvirate of tenets", academics often use the framework of distributive, procedural and restorative justice to evaluate local, national and international just transition initiatives.⁴ Some literature goes further by using the phrase 'just transformation' to reflect the need for a whole systems approach to decarbonisation, an inclusive society-wide transition and one that is supported by citizens.⁵

In recent years Just Transition has been the subject of significant [research and analysis](#) and is increasingly enshrined [in legal obligations](#) at national and supranational level. It has been [widely acknowledged](#) that just transition policies and initiatives can deliver useful measures and on the ground action to address the social risks of industrial decarbonisation and make decarbonisation socially fair and socially supported. However, very little is known about whether and how member states are reacting to the social risks of the green transition.⁶ This briefing paper aims to fill that gap by mapping just transition initiatives on the island of Ireland.

It is important to consider both jurisdictions on the island of Ireland because of the need for close cooperation to address the shared challenge of responding to the climate emergency. In Ireland, this analysis involves an examination of alignment with the [EU's council recommendation](#) on ensuring a fair transition towards climate neutrality, a critical analysis of initiatives developed thus far (and those that are under development) and how/whether a just transition approach is being adopted to addressing the multifaceted social and economic challenges associated with the transition to climate neutrality. In Northern Ireland, there has been only a very recent emergence of just transition initiatives, mainly established under the Climate Change NI Act 2022. The prospects of these initiatives will also be explored.

National Just Transition Policies & Initiatives in Ireland

The Council of the European Union Recommendation of 16 June 2022 on ensuring a fair transition towards climate neutrality ([2022/C 243/04](#)) provides guidance for Member States on policies to ensure that the transition to climate neutrality is socially fair and inclusive. The recommendation acknowledges that losses from the transition would disproportionately harm the most vulnerable. The Council urges Member States to take proactive measures to **support workers, households, and regions**, ensuring that climate policies lead to **social progress** rather than deepening inequalities.

¹ Ben Cahill and Mary Margaret Allen, 'Just Transition Concepts and Relevance for Climate Action' (2020) Center for Strategic & International Studies.

² Setenay Hizliok et al, 'What is the Just Transition and What Does it Mean for Climate Action?' (2024) Grantham Research Institute on Climate Change and the Environment.

³ Emma James et al, 'Final Report: Fair Energy Transition for All - How to Get There?' (2022) [Fair Energy Transition](#).

⁴ Darren McCauley and Raphael Heffron, 'Just Transition: Integrating Climate, Energy and Environmental Justice' (2018) Energy Policy 119.

⁵ Panagiotis Fragkos et al, 'Energy Poverty and Just Transformation in Greece' (2023) in Bardazzi, R., Pazienza, M.G. (eds) Vulnerable Households in the Energy Transition. Studies in Energy, Resource and Environmental Economics. Springer,

⁶ Matteo Mandelli, 'The Comparative Politics of Just Transition Policies: building green-red winning coalitions in Spain and Ireland' (2024) Journal of European Public Policy.

However, even before the Council recommendations in 2022, Ireland had already begun to establish Just Transition initiatives within its climate governance architecture or enhance existing measures to include Just Transition considerations, and Ireland now has a suite of both nationally driven and EU-mandated policies designed to make progress towards a just transition. This section will explore 'home-grown' just transition policies in Ireland.

The National Just Transition Fund

The Wider Midlands was the [first region in Ireland](#) experiencing concentrated transition away from carbon intensive activities, namely commercial peat extraction. The [National Just Transition Fund 2020](#) acted as a key pillar of the Government's plan for the Midlands region to support communities transitioning to a low carbon economy. The primary focus was retaining workers and generating sustainable employment in green enterprise across the region.

Ireland's National Just Transition Fund, financed by 6 million euros from national carbon tax revenues and 5 million euros from the state electricity company acted as *"an investment-oriented measure, fostering economic development and active labour market policies."*⁷ Private, public, and community/ voluntary organisations are eligible to submit projects for financing, provided they contribute to at least one of the following priorities: 'employment & enterprise', 'training', and 'community transition'. **The fund closed at the end of 2024.**

The Joint Oireachtas Committee on Climate Action

In 2018, the Irish Parliament established the [Joint Oireachtas Committee on Climate Action](#), comprising sixteen members of the lower house and six senators from different parties. Within this committee, just transition was discussed multiple times, owing to the active role of some members of Parliament. The final [report of this committee](#) in 2019 led to a cross-party consensus on climate action, including on just transition recommendations.

The Just Transition Commissioner

The Minister of the Environment appointed a **Just Transition Commissioner** Kieran Mulvey in November 2019 to engage with stakeholders in the midlands region and recommend the essential elements of a just transition, culminating in four ["Just Transition Progress Reports"](#). **His mandate ended in December 2021.**

National Economic and Social Council

Additionally, the Government asked the [National Economic and Social Council \(NESC\)](#) to examine the transition to a low-carbon future and to [provide recommendations](#), in order to better understand and prepare for a 'just transition'. This [report](#) was published in March 2020.

Revision of the national climate law

In 2021, Ireland substantially revised and amended its national climate act with the aim of bringing it in line with international best practice including a net-zero target in line with the European Climate Law. The Act provides for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to climate neutral economy by no later than 2050 and to promote climate justice

⁷ Ibid at 14.

and a just transition. In addition, for the purposes of preparing national climate action plans and a long-term strategy the Minister shall have regard to the requirement for a just transition to a climate neutral economy *"which endeavours, in so far as is practicable, to – maximise employment opportunities, and support persons and communities that may be negatively affected by the transition"*.⁸

[Recent research](#) has found that legal requirements in national framework climate laws substantially shape the realisation of just transitions through *"determining the meaning of the concept as well as actors, information and considerations that are considered relevant within the policymaking process."*⁹ However, she further observes that *"abstract and aspirational legal requirements, combined with the lack of robust accountability, can transform the mechanisms into performative laws"*.¹⁰

Matteo Mandelli undertook a comparative case study on the operationalisation of just transition within framework climate laws in Ireland, Scotland and Spain. This study found that Ireland's definition of a 'just transition' within its national framework climate law aligns with the EU Green Deal's conceptualisation of just and inclusive transition that 'leaves no-one behind' and incorporates concerns of people, regions, industries and workers. Overall, Mandelli [concluded](#) that Ireland's Just Transition Plans explicitly refer to the just transition concept and have constructed their JT policies by *"incorporating social dimensions into national climate policies while putting particular emphasis on the phase out of fossil fuels"*.¹¹ For a more detailed analysis on the incorporation of just transition obligations into Ireland's Climate Act see EJNI's corresponding paper on Just Transition Obligations.¹²

Just Transition in Ireland's National Climate Action Plans

The definition of a Just Transition was expanded in operative parts of the law including [Ireland's National Climate Action Plan \(2021\)](#) that incorporated a *Just Transition Framework* made up of four principles:¹³

1. An integrated, structured, and evidence-based approach to identify and plan our response to just transition requirements;
2. People are equipped with the right skills to be able to participate in and benefit from the future net zero economy;
3. The costs are shared so that the impact is equitable and existing inequalities are not exacerbated;
4. Social dialogue to ensure impacted citizens and communities are empowered and are core to the transition process.

Ireland is legally required to prepare and publish a yearly National Climate Action Plan under the Climate Action and Low Carbon Development (Amendment) Act 2021.¹⁴ These plans play a central role in advancing and operationalising Ireland's obligations to ensure a just transition. While there was no reporting requirements on just transition prescribed in the Ireland's Climate Law, the [2023 Irish Climate Action Plan](#) (CAP) clarifies that relevant ministers should report to the Oireachtas on how the '*principles*

⁸ Section 6(8)(k) of the Climate Action and Low Carbon Development Act 2015 (as amended).

⁹ Vilja Johansson, 'Just transition in framework climate laws: Between meaningful governance and performative law' (2025) Review of European Comparative and International Environmental Law 155, 160.

¹⁰ Ibid.

¹¹ Mandelli (n6) 8.

¹² Orla Kelleher, 'Mapping Just Transition Legal Obligations on the island of Ireland', May 2025, Environmental Justice Network Ireland Research Paper.

¹³ Government of Ireland, *Climate Action Plan 2021: Securing Our Future* (2021) 40.

¹⁴ Section 6 of the Climate Action and Low Carbon Development Act 2015 (as amended).

for a just transition are being addressed under the most recently approved *Climate Action Plan*, including the policies mitigation measures and adaptation measures for each sector'.¹⁵ This aims to ensure that Ireland's climate action policies are implemented through the lens of a JT framework and policies across the government are informed by a JT approach. In addition, the 2023 plan included a commitment to establishing a Just Transition Commission.

CAP 2023 included a dedicated section for '*delivering a just transition in the midlands regions*' of Ireland'.¹⁶ This section emphasises employment opportunities and creation in sectors such as renewable energy, tourism, agriculture, and peatland restoration projects as central to the process of a fair, equitable and just transition in Ireland. However, [analysis](#) has found that Ireland's just transition policy is too narrow in scope and focuses too heavily on mitigating the impacts on employment in the fossil fuel industry, specifically, peat extraction. Ireland's [Climate Change Advisory Council](#) (CCAC) has encouraged the government to think more broadly about just transition and has been critical of the lack of integration of social policies and inclusion of vulnerable groups in the development of climate plans. In addition, the CCAC recommended the development of a set of national indicators to measure Ireland's progress towards a just transition and the implementation of Ireland's just transition framework across all mitigation and adaptation policy development.¹⁷

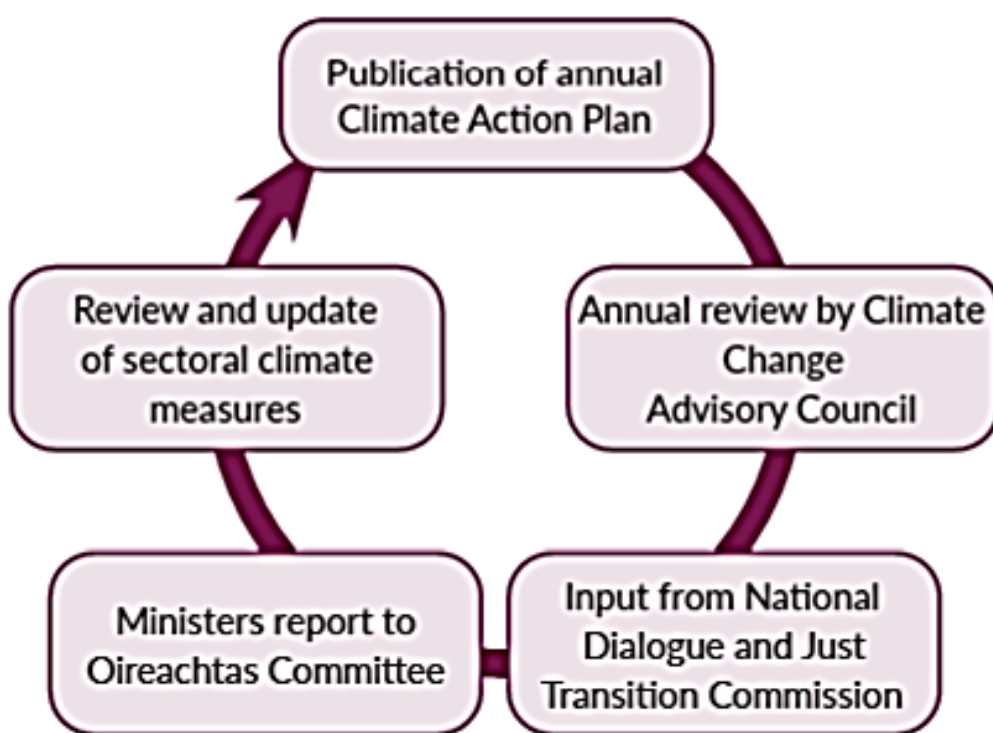


Figure 1 Incorporation of just transition into the Annual Climate Policy Cycle. Source: [Climate Action Plan 2023](#)¹⁸

Ireland's recently published [CAP 2025](#) expanded on the Just Transition principles adopted in CAP 2021 (see Figure 2 below). This aims to mainstream the Just Transition Framework across climate policy-making and embed just transition into climate action dialogue and engagement. In addition, the Department on

¹⁵ Government of Ireland, *Climate Action Plan 2023: Changing Ireland for the Better* (2023) 71.

¹⁶ *Ibid* at 80.

¹⁷ Climate Change Advisory Council, *Annual Review* (2023) 106.

¹⁸ *Ibid* (n15) 72.

the Environment, Climate and Communications (DECC) proposed to develop a JT toolkit to provide further guidance to policymakers in different sectors on the integration and implementation of JT principles across climate action policies. Ireland's CAP25 acknowledged that the ongoing integration of JT into Ireland's climate action policies are guided by the Council of the [European Union's 2022 recommendations](#). For example, in regard to principle 3 of the Council Recommendations: *"The costs are shared so that the impact is equitable and existing inequalities are not exacerbated"*, Ireland's 2025 national budget included 951 million euros in carbon tax revenue, an increase of 163 million euros compared to 2024, and this was allocated towards redistributive measures such as socially progressive national retrofitting programme, social welfare initiatives and funding to encourage farming in a greener and more sustainable way.¹⁹

CAP25 has been [strongly criticised](#) by civil society because it does not address ongoing failures to meet legally binding emissions reductions and gaps in carbon budgets. The National Economic and Social Council also published a report in April 2025 *"Ireland's Future Power System and Economic Resilience"* urging the government that actions must be taken now, next, and later to reinforce Ireland's energy transition and economic resilience, in order to reach national decarbonisation potential. In addition, the JTC found that while the just transition case studies included in Ireland's CAP25 may be informative, they do not allow for deeper understanding of how Ireland's JT framework is being applied to climate policy nor how they've considered the assessment of these initiatives towards vulnerable communities.²⁰

Action Number	Action
JT/25/1	Develop Just Transition Indicators Framework
JT/25/2	Develop a Just Transition Policy Toolkit to support the integration of just transition considerations in policymaking
JT/25/3	Establish the Skillnet Ireland Offshore Wind Skills Development Programme
JT/25/4	Develop Skills and Capabilities for Sustainable Agriculture
JT/25/5	Undertake a technical feasibility study for the establishment of a National e-Mobility Capability Centre

Figure 2: Actions on Just Transition for 2025 Source: [Climate Action Plan 2025](#)²¹

Energy Poverty Action Plan

Ireland's [Strategy to Combat Energy Poverty 2016-2019](#) was replaced by [Ireland's Energy Poverty and Action Plan](#), published in December 2022. Building on the previous strategy and core principles²², the EPAP (2022) reflected updated just transition principles under the Climate Action Plan and incorporated the post-COVID context and energy crisis caused by Russia's invasion of Ukraine. This was sorely needed considering at the time [48% of Ireland's housing stock is energy inefficient](#), with poorly insulated homes

¹⁹ Government of Ireland, *Climate Action Plan 2025* (2025) 42.

²⁰ Just Transition Commission Ireland, 'An Introductory Report of the Just Transition Commission of Ireland' (2025).

²¹ Ibid (n19) at 44.

²² Government of Ireland, *Energy Poverty Action Plan 2022* (2022) 5.

locked into fossil fuel dependence. These energy inefficient homes are one of the leading contributors to Ireland's emissions, accounting for [19.8% of Ireland's carbon emissions](#).

Who governs this initiative? What are the reporting requirements?

The EPAP was developed by the Department of the Environment, Climate and Communications (DECC). The Energy Poverty Steering Group is required under the Action Plan to outline progress against the various actions contained in the Plan in an [Annual Report](#), submitted to Government prior to publication. The implementation of the Action Plan has been monitored by a cross-departmental Steering Group, chaired by the Department of the Environment, Climate & Communications and including representatives from the Departments of Social Protection, Housing, Finance, Public Expenditure, NDP Delivery and Reform, Health and Rural & Community Development, along with the Commission for Regulation of Utilities (CRU), the Sustainable Energy Authority of Ireland (SEAI) and the HSE.

Aims & Actions

"Addressing energy poverty is at the heart of the just transition. This is the guiding principle of this Energy Poverty Action Plan" - Minister of the Environment.²³

This plan sets out a range of measures to ensure that those least able to afford increased energy costs were supported and protected to adequately heat and power their homes over winter 2022/23. The action plan falls into two categories i) near-term: supporting people through the winter 22/23, ii) medium term: with the focus on using energy efficiency upgrades to help tackle the root causes of energy poverty and ensure an inclusive and just transition to net zero.²⁴

Targeted groups

- Low-income households
- People who live in energy inefficient homes
- Those at risk of energy poverty

Analysis

In 2022, the EU Commission published [25 recommendations](#) to tackle Energy Poverty across the EU, which aimed to protect Europe's most vulnerable citizens and ensure that Europe's energy transition is fair and just. Investment in energy efficiency and renewable energy are among the structural measures included in the recommendation, which aims to address the root causes of energy poverty. This followed the adoption of the [Energy Efficiency Directive](#) which included for the first time, an EU wide definition of energy poverty and how energy poverty can be diagnosed at national level. These recommendations pointed to National Energy and Climate Action Plans (NECPs) and Social Climate Plans (SCPs) as opportunities for member states to incorporate these recommendations on energy poverty.²⁵ In response to this, DECC initiated a [public consultation](#) in March 2024 to gather views for the revision of the EPAP. DECC stated that it would incorporate the EU Commission's recommendations into the revised Action Plan and utilise them as a measurement framework going forward. However, not only is there no updated or revised version of the EPAP, but the department has also not released any information detailing the outcomes of that consultation. There was also no mention of Ireland's EPAP in Ireland's 2025 [Programme for Government](#).

Access to adequate levels of energy is essential to social inclusion and is increasingly connected to employment opportunities in Ireland. [Analysis](#) has argued that energy poverty should be addressed through a rights-based approach considering that because energy poverty is a multi-dimensional problem it requires a multi-dimensional response. A rights-based approach can facilitate coherence and coordination across law and policy, enabling a more integrated 'whole of government' response.²⁶ As the

²³ Ibid at 1.

²⁴ Ibid at 3.

²⁵ See critical analysis of energy poverty sections in Ireland's NECP in part II.

²⁶ Community Law & Mediation and the Centre of Environmental Justice, [Submission to Energy Poverty Action Plan Consultation](#) (2024).

Feminist Communities for Climate Justice highlighted in their submission to the Consultation on the Revised Energy Action Plan, a focus solely on income as an indicator of energy poverty ignores identity-based disadvantages such as women, disabled people, migrants, travellers, asylum seekers, and lone parents (a majority of whom are women) - who are more susceptible to experiencing energy poverty.²⁷ As Feminist Communities for Climate Justice have highlighted, 'the cultural and gendered associations that see women carrying out the majority of caring work also plays a role in gendered uses of energy and has [implications](#) for gendered vulnerability to energy poverty'. Civil society's [response](#) to the consultation on the revision of Ireland's Energy Poverty Plan highlighted a range of existing gaps in the 2022 plan including (but not limited to):

- Barriers to financing options to retrofitting
- Addressing Ireland's national retrofit programme in accordance with the principles of a Just Transition
- Targeting energy poverty in rural areas
- Targeting energy poverty in more vulnerable communities such as the traveller community
- Further actions to alleviate energy poverty in the rental sector
- Lack of acknowledgement on the gendered experience of energy poverty
- Inaccuracy and inadequacy of Ireland's expenditure-based method of measuring energy poverty
- Lack of disaggregated data to represent in detail disproportionate impact of energy poverty experienced by marginalised communities in Ireland
- Lack of transport costs in measurements and definitions of energy poverty.

Updates

The recently adopted CAP25 stated a record budget of €240 million was provided to the [Warmer Homes Scheme](#) in Budget 2025. The Scheme offers free energy upgrades to eligible homeowners who are most at risk of energy poverty. This is an €83 million increase on the scheme's 2023 budget when 5,800 homes benefitted from a budget of €157 million and received fully funded upgrades.²⁸

The plan also referred to opening another public consultation for the revised Energy Poverty Action Plan that will be published to set out a wide range of clear, timebound actions aimed at tackling energy poverty with appropriate governance and evaluation, building on and supplementing existing measures.²⁹ However, the absence of progress on the previous "revision" of the EPAP provided little reassurance on the next iteration of public consultation.

In fact, in July 2025 the new Minister of the Environment launched a [National Energy Affordability Taskforce](#) (NEAT) to address high energy costs for households and businesses occurring during the transition to a low carbon economy. The taskforce's work programme will include the preparation and publication of an Energy Affordability Action Plan. Civil society organisations have raised a range of concerns regarding the decision to replace the long, drawn-out revision of the Energy Poverty Action Plan with a broader Energy Affordability Action Plan. This includes the decision by the department to exclude civil society representation in the NEAT and the implication that the previous commitments to address the structural, intersectional, and justice-based dimensions of energy poverty in Ireland have been de-prioritised.

Taskforce on Just Transition

The Minister for the Environment, Climate and Communications convened a 'Taskforce on Just Transition' in September 2023 in line with CAP 2023 commitments. The aim of this taskforce according to DECC was

²⁷ Fiona Dukelow et al, 'Feminist Climate Justice Report' (2024) 63.

²⁸ Ibid (n19) 42.

²⁹ Ibid.

"to build consensus on an agreed approach on the establishment of a Just Transition Commission and to provide advice to the Minister and Government regarding the mandate, membership, and structure of a Just Transition Commission".³⁰ This culminated in a report of the [Taskforce on Just Transition](#), that recommended the Commission should provide evidence-based, independent advice to the Government on the just transition implications of climate policy development through the national Climate Action Plans including consultation, communication, and constructive engagement with stakeholders most impacted by our national and international commitments on climate action. The taskforce recommended that the JT Commission's advice to government needs to be informed by direct engagement with vulnerable communities and social partners. The report also provided a definition of a just transition that they deemed appropriately reflected the situation with regard to Ireland:

"A Just Transition to a climate neutral Ireland 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."³¹

The report acknowledged the [Council of the EU's recommendations of ensuring a fair transition towards climate neutrality](#) and its objective to provide Europe with the tools to strive for more social fairness, shared prosperity, and decent work.

Just Transition Commission

"It is also clear that there is much to do in better defining, communicating and emphasising the critical role of a just transition in ensuring fairness, equity and unlocking its many opportunities".³² – Ali Sheridan (Chairman of the Just Transition Commission Ireland)

Ireland's [Just Transition Commission](#) began operating in December 2024 as an independent non-statutory advisory body appointed for a three-year term. Key roles include monitoring the implementation of the just transition principles set out in Ireland's Climate Action Plans and to produce reports and recommendations to the Government and to the Oireachtas on progress. This includes evidence-based advice to inform policy planning related to a just transition across sectors and to support the government and wider societal stakeholders in managing this transition.³³ In February 2025, the Commission detailed the key areas of focus in [a letter to the new Minister of the Environment](#), including the scrutiny of the integration of the Government's own just transition objectives into relevant policy areas in key government departments. They noted support for the work of the Commission in engagement with communities, addressing their concerns and re-ensuring they benefit from the climate action. It welcomed the new [Programme for Government's](#) re-affirmed commitment to fund socially progressive interventions in line with the JT principles that costs are shared so that impact is equitable, and existing inequalities are not exacerbated.

The recently adopted CAP25 highlighted the establishment of the JT Commission as a step further in operationalising JT principles, in that it will support the Government in its work to provide that Ireland's transition to the national climate objective has regard to a just transition as well as advising the Government on how to deliver a just transition through its climate action policies.³⁴ The Commission published an [introductory report](#) in June 2025 that consisted of initial reflections and recommendations to guide Ireland in the next stages of ensuring a fair and just transition for all. The Commission

³⁰ Government of Ireland, *Report of the Taskforce on Just Transition 2024* (2024).

³¹ *Ibid* at 4.

³² Just Transition Commission of Ireland, 'Introductory Report of the Just Transition Commission of Ireland' (2025).

³³ Minutes of the meetings of the Just Transition Commission are available [here](#).

³⁴ *Ibid* (n19) 39.

acknowledges “the relatively advanced statutory and policy frameworks already in place to support a just transition” but questions its effectiveness in delivering tangible and positive outcomes for people. It found that Ireland’s approach to ensuring a just transition must go beyond reactive policymaking and instead use a long-term approach that considers benefits for future generations.³⁵ A clear gap in Ireland’s JT framework is a lack of JT indicators, the Commission identified a need to better monitor and evaluate Ireland’s progress towards a just transition and to co-create these indicators should be developed by the most vulnerable communities.

Ireland’s Environmental Protection Agency published an [evidence synthesis research report](#) providing a Just Transition Indicator Framework for Ireland.³⁶ The aim of this framework is to provide guidance for the Government on how to “monitor and track success in ensuring a fair, inclusive and equitable transition to a low-carbon economy.” The framework was designed to be adaptable allowing for changing priorities and emerging data and found that community-focused indicators can measure the extent to which citizens feel empowered and involved in decision-making processes.³⁷ The report proposes several key actions that should be taken to ensure a fair and just climate transition including the establishment of an interdepartmental working group “with clearly defined sectoral leads to oversee implementation, periodic reviews and stakeholder engagement”.³⁸ In addition, calls for further investment in data infrastructure and the running of public engagement campaigns to raise awareness of just transition principles.³⁹

Conclusion

While the concept of a just transition has been directly incorporated into Ireland’s Climate Action and Low Carbon Development Act 2015 (as amended)⁴⁰ and further operationalised as a Just Transition Principles through National Climate Action Plans, stronger integration is required in adaptation and mitigation policy to speed-up the progress to a fair and just transition. The actions laid out in the most recent Climate Action Plan are a step in the right direction – in particular, the development of Just Transition Indicators Framework and policy toolkit to support stronger integration of just transition considerations in policymaking. However, as Vilja Johansson notes the wide political discretion offered to the vague obligations “leaves implementation of the mechanisms vulnerable to non-compliance”.⁴¹

The recent establishment of the Just Transition Commission offers hope of further oversight and evidence-based guidance to ensure government progresses towards a fair and just transition while also promoting direct engagement with vulnerable communities and social partners. However, the fact that the Commission was established on an administrative basis rather than a statutory one raises questions on the obligation of the government to adopt and implement such recommendations. Finally, a clear gap in Ireland’s progress towards a fair and just transition is the failure to address the structural causes of energy poverty and the lack of inclusion of vulnerable communities in the drafting and implementation of energy poverty plans and policies. Ireland’s obligation to tackle energy poverty under EU legislation is discussed further below.

³⁵ Ibid (32) 23.

³⁶ Andrew J. Kelly et al, “Evidence Synthesis Report 6: Just Transition Indicator Framework for Ireland” (2025) Environmental Protection Agency.

³⁷ Ibid, ix.

³⁸ Ibid.

³⁹ Ibid, X.

⁴⁰ Orla Kelleher, ‘Mapping Just Transition Legal Obligations on the island of Ireland’, May 2025, Environmental Justice Network Ireland Research Paper.

⁴¹ Ibid (n9) 169.

EU-mandated just transition policies & initiatives in Ireland

EU just transition initiatives

Ireland's just transition policies are not only nationally driven but are also significantly shaped by supranational obligations. This next section examines Just Transition plans and initiatives that have emerged in Ireland from EU supranational funding mechanisms and through EU legal requirements such as the Governance Regulation (e. g. through the need to comply with requirements for National Energy and Climate Plans, NECPs).

The EU has created funding mechanisms to assist Member States in mitigating some of the socio-economic consequences of the green transition:

- Just Transition Fund (JTF): Supports regions most affected by the transition.
- Social Climate Fund (SCF): Helps vulnerable households with energy and transport costs.
- European Social Fund Plus (ESF+): Funds training and employment support

The [Just Transition Mechanism](#) also provides 55 billion euros of targeted supports from 2022 to 2027 for the transition of EU territories that host emissions intensive industries and are thus most affected by the transition:

- Pillar 1: Just Transition Fund (25.4 billion available)
- Pillar 2: Invest EU 'Just Transition' Scheme (Potential to mobilise 10-15 million euros in private sector investments)
- Pillar 3: Public Sector Loan Facility (Potential to mobilise €18.5 billion in public investment)

Legal obligations derived from EU law are discussed in detail in EJNI's '*Mapping Just Transition Legal Obligations on the island of Ireland*' [research paper](#).

Territorial Just Transition Plan

As of the 29th of November 2022, the EU Commission adopted [Ireland's Territorial Just Transition Plan](#) and [associated programme](#). This plan incorporated 84.5 million euros of funding from the EU Just Transition Fund for 2021-2027. This was matched by national funding which provided up to 169 million for investments in the midlands region. These include the territorial areas of the counties of Laois, Longford, Offaly, Westmeath and Roscommon and the Municipal Districts of Ballinasloe (County Galway), Athy, Clane-Maynooth (County Kildare) & Carrick-on Suir and Thurles (County Tipperary). This [plan](#) laid out the impacts on these areas as a result of the ending of peat extraction for energy production and identified the needs and priorities to address these impacts.

To inform the development of the TJTP and the Just Transition Fund (JTF) Programme, the European Commission funded an analysis ([D3 Report on the Transition Process Toward Climate Neutrality](#)) via the Structural Reform Support Programme (SRSP). To ensure that Ireland's TJTP and Programme targets the most negatively affected communities, the Department of the Environment, Climate and Communications commissioned [a complementary analysis](#) to identify the most negatively affected territory based on key socio-economic, demographic and environmental indicators. This also included two '[People & Place](#)' reports that provided evidence-based recommendations as to the most Negatively Affected Territory to be supported by the Territorial Just Transition Plan.

The Territorial Just Transition Plan detailed several *existing* initiatives (see section on Ireland's National Just Transition Fund) that had already been established for accelerated rehabilitation, restoration and management of peatlands. The TTJP aimed to complement these initiatives in the territories that are not already supported by existing funding programmes.

Who governs this initiative? What are the reporting requirements?

The main national institution tasked with the coordination and the implementation of the TJTP is the [Eastern and Midland Regional Assembly \(EMRA\)](#). A key monitoring mechanism for implementation includes a Programme Monitoring Committee (PMC), that meet once a year to review progress in programme implementation. Membership includes representatives of the managing and national authorities, audit authority, intermediate bodies, regional and local stakeholders, representatives of economic and social partners and civil society bodies, and other EU Funds. Partners and stakeholders are directly involved in delivering the performance framework and monitoring progress. A mid-term evaluation is expected to take place in 2025, to track progress made in delivery against output indicators. As of July 2025, no mid-term evaluation has taken place. In September 2024, it was reported that MEP Ciaran Mullooly initiated consultations with community groups in the Midlands to assess effectiveness of the fund's allocations, particularly concerning former Bord na Móna and ESB workers.⁴² In May 2025, he [put forward](#) two amendments in the European Parliament to provide more time and flexibility to deliver projects under EU Just Transition Fund in Ireland's Midlands to help alleviate the impacts of the closure of carbon-intensive industries.

He [reported](#) that the *"the sudden closure of ESB's West Offaly and Lough Ree power stations, alongside the wind-down of Bord na Móna's peat operations, led to the loss of up to 1,000 jobs in just two to three years. By comparison, countries like Poland have been given decades to manage similar transitions."*

Aims

[Ireland's TJTP](#) identified three cross-cutting priorities:

1. **Generating employment for former peat communities by investing in the diversification of the local economy** by supporting productive investment in enterprise, SMEs and community actions, focusing on sectors and activities which can address the economic challenges of the transition.⁴³
2. **Supporting the restoration and rehabilitation of degraded peatlands and the regeneration and repurposing of industrial heritage assets** to enable the transition towards climate-neutrality while also facilitating the diversification and modernisation of the economy of the territory.
3. **Providing former peat communities with smart and sustainable mobility options to enable them to benefit directly from the green transition** by supporting clean, green mobility to build regional attractiveness and support economic development.

Targeted groups

The TJTP identified vulnerable groups that are targeted through the TTJP plan and associated programme:

- **Bord na Mona and ESB employees:** the decision to close West Offaly and Lough Ree power stations in 2020, resulted in the 380 Bord na Móna workers to leave through a Voluntary

⁴² Ciaran Mullooly was appointed as the European Parliament's Rapporteur for the report: *"The role of cohesion policy in supporting the just transition"*. In this capacity, he is responsible for leading discussions within the Committee on Regional Development, consulting stakeholders, and drafting recommendations to shape EU policy on just transition initiatives.

⁴³ Government of Ireland, *EU Just Transition Fund Programme 2021-2027* (2022) 9.

Redundancy scheme – 210 permanent employees and 170 seasonal employees, with a further 70 retirees/resignations.⁴⁴

- **Impacted communities:** these territories are largely rural, *“there are limited alternative local-employment opportunities for workers with highly specific and thus hard to transfer skillsets. Development of local social enterprise, retail and tourism were seen as crucial to provide tangible opportunities for economic growth of direct benefit to impacted communities.”*⁴⁵
- **Local SME’s:** *“Most of Counties Roscommon, Longford and Offaly, northern parts of Co. Westmeath, the west of Co. Laois and most of the Carrick-on-Suir MD are classified as disadvantaged. Gross median household income of the Territory is lower than the national average. Business demography data highlights the significance of indigenous employment and small and medium enterprises for the region. Irish-owned firms with less than 10 employees accounting for the vast majority of firms providing employment.”*⁴⁶

Analysis

Ireland’s TTJP and EU Just Transition Fund Programme provided an early indication of how region-specific development priorities mapped on to national and EU policy objectives on just transition. In 2020, the decarbonisation from peat in the midlands was one of the first practical Just Transition initiatives to take place on the island of Ireland. Academic [analysis](#) argued that this initiative could serve as an international example of *“proactive, inclusive and place-based just transition to an economy that operates within environmental and social limits”*.⁴⁷ Place-specific and locally led initiatives are important mechanisms to reduce social exclusion which is a key indicator that climate policy is being created in an equitable, just, and fair manner.⁴⁸ However, [critical analysis](#) suggests that if just transition strategies are to mitigate uneven impacts, Irish climate policy must go beyond place-based initiatives.⁴⁹ In addition, the JTC found in its introductory report that just transition in Ireland has largely been associated with the shift away from peat-based industries and that it is important moving forward to broaden the conversation beyond the Midlands, *“ensuring that just transition becomes a national priority for all of Ireland”*.⁵⁰

There is quite extensive academic [analysis](#) on the JT initiatives concerning the process of decarbonisation away from peat extraction in Ireland. Some [argue](#) that spatial justice approach should act as a prerequisite for a Just Transition. The concept of spatial justice is intertwined with the social justice principles of procedural, distributive, and restorative justice which act as core foundation to our understanding of the just transition.⁵¹ A 2022 academic [case study](#) investigation used this framework to illustrate how stakeholders can have different interpretations and perceptions of how justice may be achieved and how workers and more specifically how communities in Ireland’s peatlands perceived the TTJP programme that was designed for them. One of the major themes that emerged from this research was how these communities felt unheard and excluded from policy decisions. Many attributed this to the lack of proper just transition planning and a continued neglect for the needs of rural Ireland in policymaking.⁵²

Notably, the plan and its consultations did not capture or address those impacted by decarbonising in ways other than the loss of the industrial scale peat cutting jobs and incomes. For example, householders in areas of intergenerational poverty experiencing a loss of a cheap fuel source in the form of peat that

⁴⁴ Ibid at 4.

⁴⁵ Ibid at 10.

⁴⁶ Ibid at 8.

⁴⁷ Sinéad Mercier, ‘Four Case Studies on Just Transition: Lessons for Ireland’ (2020) National Economic and Social Council Research Series, Paper no.15.

⁴⁸ Middlemiss et al, ‘Conceptualising Socially Inclusive Environmental Policy: a Just Transition to Net Zero’ (2023) Cambridge University Press 22, 4.

⁴⁹ Ibid (n27) 44.

⁵⁰ Ibid (n32) 21.

⁵¹ Aparajita Banerjee and Geertje Schuitema, ‘Spatial justice as a prerequisite for a just transition in rural areas? The case study from the Irish peatlands’ (2023) Environment and Planning 41, 6.

⁵² Aparajita Banerjee and Geertje Schuitema, ‘How Just are Just Transition Plans? Perceptions of Decarbonisation and Low Carbon Energy Transitions among Peat Workers in Ireland’ (2022) Energy Research & Social Science 88.

they harvested themselves from their own plots, now illegal. These households were then exposed to the drastic increases in oil and gas prices. They may additionally be impacted by the loss of “breadwinner” jobs in the industrial peat industry. These gaps may be as a result of the low level of public consultation or proactive engagement outside the peat industry in the preparation of the TTJP. In particular, intersectional impacts on those with low income, poor housing, energy efficiency, low levels of education and significant disability were not captured, and there appears to have been no distinct consideration of the impacts on marginalised groups like the elderly who would be more likely to be dependent on peat as a fuel source, or groups like members of the travelling community in these regions, or migrant/non-English speaking populations. Ultimately, the Just Transition Commission acknowledged that it is still too early to fully assess the impact of investment from just transition initiatives on communities in the midlands.⁵³

Ireland’s Social Climate Plan

The [Social Climate Fund](#) (SCF) is part of the European Union's Fit for 55 package and is the first fund dedicated to counterbalancing the negative socioeconomic effects of the extension of the Emissions Trading System (ETS 2) that will apply to the transport and building sectors. In order to access this fund, Ireland is required to prepare, consult upon, and submit a national Social Climate Plan to the European Commission before [30th June 2025](#) and co-finance at least 25% of the estimated total costs.⁵⁴ Before any disbursements are made, plans will be assessed and either approved or rejected by the Commission, depending on relevance, effectiveness, efficiency, and coherence.⁵⁵ These plans outline how they will allocate SCF resources and define programmes for the 2026-2032 period to address the social and distributional impacts of rising fossil fuel prices. CAN Europe has outlined key [proposals](#) for national Managing Authorities to prepare for a truly effective National Social Climate plan.

Governments are also obligated to consult relevant stakeholders, including civil society organizations, during the development of their SCPs. For a more detailed breakdown of public participation requirements see EJNI's briefing paper *“Public Participation and Ireland’s Social Climate Plan”* (2025), available [here](#).

Aims

The Social Climate Fund was established to support low-income and vulnerable households, micro-enterprises, and transport users by mitigating the socio-economic impacts of the transition to net zero. The SCF focuses on providing both immediate support (e.g., income support) and long-term measures (e.g., structural renovations) to address energy and transport poverty.⁵⁶ Its creation represents an important step in integrating a social policy and social justice aspect into EU climate policies, creates an opportunity to balance out the social cost of climate action as much as possible, and co-create reforms and investments by and for citizens, contributing to an equitable decarbonisation pathway.⁵⁷ The Fund focuses on three key areas: energy efficiency and decarbonisation of buildings; promoting clean mobility, and temporary direct income support.

For more a more detailed breakdown on the EU’s Social Climate Fund and Social Climate Plan and its implications for Ireland see EJNI briefing paper *“[The EU’s Social Climate Fund and Social Climate Plan: Implications for Ireland](#)”*. This briefing paper covers:

⁵³ Ibid (n32) 14.

⁵⁴ Regulation (EU) 2023/955 of the European Parliament and of the Council of 10 May 2023 establishing a Social Climate Fund.

⁵⁵ Catherine Devitt and Alison Hough, ‘The EU’s Social Climate Fund and Social Climate Plan: Implications for Ireland’ (2025) EJNI briefing paper.

⁵⁶ Ibid.

⁵⁷ Ibid.

- Important considerations for the development and delivery of national SCPs.
- Recommendations on the substantive content of the national plans.
- The scope of potential measures, investments, and supporting activities eligible under the Social Climate Fund.
- Compatibility with other EU plans and policies.

To assist Member States with planning, the Commission has published [technical guidance](#) notes on:

- Good practices for cost-effective measures and investments
- Guidance on the Social Climate Plans
- Technical guidance on applying the 'do no significant harm' principle under the Social Climate Fund Regulation.

Updates

In July 2023, the then Minister for the Environment, Climate, and Communications [stated](#) that the public consultation for the Social Climate Plan would build on ongoing efforts, including measures from the 2022 Energy Poverty Action Plan and the National Residential Retrofit Plan, and the redistribution of carbon tax revenues. The Minister also noted at that time that Ireland proposes to use existing platforms, such as the National Dialogue on Climate Action, as well as other methods for public engagement.

Ireland's recently adopted [CAP25](#) referred to the EU Social Climate Fund as a key source of funding to tackle the social impacts of decarbonisation such as targeted supports for vulnerable households, microenterprise and transport users to mitigate the impacts of the increases in the costs of fossil fuels on the most vulnerable.⁵⁸ However, responses to parliamentary questions from the Minister for the Environment, Climate and Communications confirmed that while the department began preparing a draft Social Climate Plan in line with the European Commission guidance in early 2025, the submission of the plan will miss the deadline of June 30th 2025 and is likely to be submitted "*in the second half of 2025*".⁵⁹

Another significant development is that Ireland has requested to opt out of ETS2 between 2027-2030. However, this does not exempt Ireland from protecting those most affected by the costs of the transition. Therefore, Ireland is still obligated to draft and implement a SCP to ensure the social impacts of carbon pricing are addressed effectively and equitably.⁶⁰

EJNl has recommended a number of key asks and priorities for Ireland's Social Climate Plan to ensure its fit for purpose and to help other civil society organisations prepare their response and advocacy efforts in advance, available [here](#). In addition, over 32 EU and national organisations partnered up to launch an in-depth, ongoing [analysis](#) of the EU's 27 national Social Climate Plans. This [tracker](#) rates the plans based on public participation, targeting of beneficiaries, types of measures, and coherence with other national policy and funding strategies. European Environmental Bureau have also devised a set out [10 measures](#) to be included in National Social Climate Plans.

Ultimately, Ireland's Social Climate Plan presents an important opportunity to directly address the socio-economic impacts of Ireland's transition to net zero. Therefore, this plan has the potential to act as a key just transition initiative in Ireland's climate policy framework to deliver tangible social and environmental benefits for those most impacted by the costs of the green transition.⁶¹

National Energy and Climate Plan (NECP)

⁵⁸ Ibid (n19) 63.

⁵⁹ Reply by Minister O'Brien to Parliamentary Questions <https://www.oireachtas.ie/en/debates/question/2025-02-11/80/> by Eoin O'Brien.

⁶⁰ Ibid (n55) 1.

⁶¹ Catherine Devitt, 'What Ireland's Social Climate Plan Must Include: Six Key Priorities' (2025) EJNl briefing paper.

Adopted in December 2018, [the EU Governance Regulation](#) requires all EU Member States to prepare a 10-year National Energy and Climate Plan (NECP) for 2021-2030 and long-term strategies up to 2050. The NECP revision process which took place in 2023-2024 offered Ireland an opportunity to clarify its plans for how to deliver a just and fair transition by addressing areas such as energy efficiency, renewable energy, GHG emission reductions, energy infrastructure, and research and innovation. Overall, Ireland faced delays throughout the process of updating its NECP, [impacting public participation and progress on climate targets](#). Eventually, a first draft of the updated NECP was submitted to the European Commission in December 2023 - [five months late](#). The final NECP was submitted slightly late in mid-2024.

In line with the objective of this paper the following analysis is limited to the obligations related to just transition and energy poverty. For a more detailed analysis of the overall aspects of Ireland's NECP and its failure to close Ireland's emissions gap and align with domestic and EU targets, see EJNl briefing paper "Assessment of Ireland's Final Draft National Energy and Climate Plan: A missed opportunity to deliver faster and fairer climate action" [here](#).

Just Transition Aspects

Member States are required to include in their NECPs *"macroeconomic and, to the extent feasible, the health, environmental, employment and education, skills, and social impacts, including just transition aspects (in terms of costs and benefits as well as cost effectiveness) of the planned policies and measures"*⁶²:

In the [Commission Notice on the Guidance to Member States for the update of 2021-2030 NECPs \(C/2022/9264 final\)](#), chapter 1.3.1. on *"Mitigating the social and employment impacts and delivering on a just a fair energy and climate transition"* indicates that the updated NECPs should reflect better the socio-economic impacts than the initial national plans. In this regard, the Commission Notice invited Member States to fully take into [consideration the Council Recommendation of 16 June 2022](#) on ensuring a fair transition towards climate neutrality for the process of updating their NECPs. In particular, Member States: *"should develop clear strategies identifying and measuring the social, employment and skills consequences (or any other distributional impacts) of the energy and climate transition and give proper consideration on how to effectively address these challenges."*⁶³ Furthermore, updated NECPs should reflect the transition process outlined in the Territorial Just Transition Plans (TJTPs) as well as explain the synergies between the 2030 climate and energy targets and the transition from fossil fuels, as laid down in [Article 11\(4\) of Regulation \(EU\) 2021/1056](#) establishing the Just Transition Fund.

The [European Commission's assessment](#) of Ireland's first draft NECP in February 2024 highlighted insufficient ambition, lack of detailed policy scenarios, and inadequate public participation. In regard to its just transition obligations, the Commission found that Ireland's updated NECP only partially addresses the requirements regarding a just transition. For example, the plan mainly focused on regions transitioning away from peat and carbon-intensive industries but lacked a comprehensive, national strategy to manage just transition challenges across the country. Ultimately, it failed to adequately consider the broader health, environmental, employment, education, skills, and social impacts of the climate and energy shift, and does not include in-depth cost-benefit analyses or comparisons to existing policy projections. Nor did it effectively incorporate considerations of human rights and gender equality.

However, [a recent report](#) from CAN-E found that most of the EU plans failed to respond to key EU just transition requirements - thereby *"undermining their potential to serve as strategic roadmaps for a fair, inclusive transition, while risking the exacerbation of social inequalities"*.⁶⁴ The report goes further to say that the failure of MS to address these gaps undermine the legitimacy of EU climate and energy policies and hinder the ability to ensure their effective implementation. In addition, the Reform Institute produced

⁶² Article 2(b) of the Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action and amending regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council.

⁶³ Commission Notice on the Guidance to Member States for the Update of 2021-2030 NECPs (C/2022/9264 final), 29.

⁶⁴ 'Do Final NECPs Sufficiently Address EU-Level Just Transition Requirements?' (2025) CAN-Europe and Germanwatch Briefing Paper, 2.

[a report](#) reflecting on the NECP revision process and found that the national wide framework for the fair and just transition should be given a more prominent place in the NECPs and overall the NECP update was a missed opportunity to embed a fair and just transition in the MS climate and energy policy frameworks. Considering the failure to address JT obligations in the governance regulation was a MS wide issue in the revision of their NECPs, civil society orgs have urged that we need to look at reform at EU level. This includes further clarification of the role of a fair and just transition in the implementation of the EU climate and energy policies, stronger legal frameworks for preparing holistic actions leading to structural reduction of energy and transport poverty and to introduce clearly defined just and fair transition conditionality concerning the distribution of EU funds.⁶⁵

Energy Poverty

In addition to just transition obligations, the governance regulation also requires that each Member State must assess the number of households in energy poverty in its NECP and where a Member State identifies a significant number of households in energy poverty, it *shall* include a national indicative objective to reduce energy poverty.⁶⁶ However, the [Commission Notice on the Guidance to Member States for the update of their NECPs \(C/2022/9264 final\)](#) specifies that "*considering the current spike in energy prices, all Member States are encouraged to set an objective for reducing energy poverty*".

Ireland did provide a percentage estimating the number of households in energy poverty in the final NECP, however it explicitly recognises the limited methodology used in this calculation: '*The ESRI [Economic and Social Research Institute] has estimated, on this basis and with unprecedented energy inflation, 29% of households in Ireland are in energy poverty and that this will rise with increases in energy costs. However, this methodology is limited as it provides no indication as to the intensity of the energy poverty being experienced or correlation to the energy efficiency levels of these homes.*'⁶⁷ The figure cited is based only on the proportion of households who spend more than 10% of their income on energy.

There is no indication that a proper assessment has been made which takes into account "*the necessary domestic energy services needed to guarantee basic standards of living in the relevant national context, existing social policy and other relevant policies, as well as indicative Commission guidance on relevant indicators for energy poverty*", as required by the Governance Regulation.⁶⁸ There is also no information on how the data on energy poverty is collected, including at national and local level, as recommended by the Commission.

Despite the relatively high percentage figure cited, also absent is a national objective for reducing energy poverty, a corresponding timeline and corresponding time bound measures. No justification is given for this omission. Also, absent are clear and concrete plans on how Ireland intends to comply with EU requirements for measuring and monitoring energy poverty levels. Ultimately, Ireland's final NECP submitted in July 2024 failed to comply with legal requirements regarding the Just Transition, energy poverty and the requirement for consistency between its Social Climate Plan and its updated NECP. This was affirmed in the Commission's final assessment of Ireland's NECP in May 2025. Therefore, Ireland has additionally failed to implement the council recommendations on ensuring a fair transition to climate neutrality, specifically [Recommendation 15](#) which encourages MS to coordinate and outline their actions for a fair transition through the preparation of national and energy climate plans. [Recommendation 28](#) urged MS to draw on this recommendation to consider mainstreaming employment, social and distributional impact assessments and fair transition aspects across the five dimensions of the Energy Union, and further enhance policy measures for addressing those impacts, with a particular focus on energy poverty.

⁶⁵ "European governance for Just and Fair Transition: Reflecting on the NECP revision process and looking ahead" Reform Institute (2025), 4.

⁶⁶ Article 3(d) of the Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action and amending regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council.

⁶⁷ Government of Ireland, "Ireland's Integrated National Energy and Climate Plan 2021-2030 July 2024" (2024), 288.

⁶⁸ Ibid (n66).

Updates

EJNl has engaged in extensive assessment, advocacy and action during the process of Ireland's update of its NECP. This culminated in a complaint to the EU Commission as part of a [pan-EU campaign](#) to demand legal action against the non-compliance with EU laws in the updating of Ireland's NECP. In May 2025, the Commission published its [EU wide assessment](#) of MS final NECPs. The Commission's [formal assessment](#) of Ireland's NECP was clear, while some progress has been made, it failed on ambition, delivery, and public inclusion. In regard to its just transition obligations, the Commission found that Ireland's NECP does not assess impacts on vulnerable groups or provide a credible foundation for the upcoming Social Climate Plan. The Commission's assessment was released on the same day Ireland's [Environmental Protection Agency](#) published shocking new emissions projections for achieving Ireland's 2030 climate targets - which together offer a stark and urgent warning about the widening gap between Ireland's climate commitments and actual delivery. EJNl's initial reaction to the Commission's assessment is available [here](#).

Conclusions

Consistency and Coherency

Ireland has made real progress in integrating just transition principles in the climate action statutory framework and the establishment of the Just Transition Commission creates an important opportunity to scrutinise government climate policymaking and monitor its progress towards ensuring a fair and just transition. In addition, the Environmental Protection Agency assessed international best practices for JT framework development and provided an initial national "*robust conceptual framework with progress on domains and potential indicators*".⁶⁹ The UNFCCC [found](#) that Ireland takes a comprehensive approach in explicitly referencing just transition in its Long-Term Low Emission Development Strategies (LT-LEDS), addressing cost-sharing and benefit-sharing in its LT-LEDS, that emphasise rebalancing existing social disparities.⁷⁰

However, Ireland's just transition policies remain fragmented and there is a lack of consistency among its NECP, TTJP, SCP and LTS. For example, Ireland's NECP does not sufficiently detail the development of the Social Climate Plan (SCP) including information on the i) estimated impact of ETS2, ii) links to the current carbon tax, and iii) the identification of vulnerable groups.⁷¹ In addition, while the plan references frameworks like the Energy Poverty Action Plan 2022, it lacks an integrated strategy to coordinate efforts, leaving gaps in addressing energy poverty and supporting a just transition beyond 2030.

Ireland will have another opportunity to address this lack of consistency in the upcoming Social Climate Plan. As per Article 6(3) of the [SCF Regulation](#), the SCP must align with a Member State's existing social, economic, and climate commitments under key EU policies and national strategies. This includes adherence to the EU State-Aid rules, the European Pillar of Social Rights Action Plan, as well as integration with cohesion policy programmes, recovery and resilience plans, and territorial just transition plans.⁷² This has the potential to facilitate a coordinated approach to decarbonisation, social inclusion and economic resilience in Ireland's climate policy and across just transition initiatives.⁷³

Public participation and inclusion of vulnerable groups

An additional issue relates to the problematic approach to public participation that has been adopted in the development of Ireland JT initiatives. **Council recommendation 23** proposes that a whole-of-society approach to the fair transition should be based on the involvement of social partners at all levels and stages, as well as effective and impactful participation of civil society and stakeholders, such coordination

⁶⁹ Ibid (n36) 29.

⁷⁰ UNFCCC-KCI, 'Just transition coverage in nationally determined contributions and long-term low-emission development strategies, implementation within key sectors, and tracking its progress' (2025).

⁷¹ European Commission, 'Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions; EU-wide assessment of the final updated national energy and climate plans Delivering the Union's 2030 energy and climate objectives' COM (2025 274 final) 54.

⁷² Regulation (EU) 2023/955 of the European Parliament and of the Council of 10 May 2023 establishing a Social Climate Fund.

⁷³ Ibid (n55).

and engagement ensures “that the European Green Deal principles of fairness and solidarity are integrated in policy design, implementation and monitoring from the outset, providing the basis for broad and long-term support for inclusive policies advancing the green transition.”⁷⁴

This paper has highlighted the overall lack of inclusion and transparency with the public and vulnerable groups in the design and implementation of Ireland’s just transition plans and policies. [Just4ALL](#), an EU-funded project, [outlined](#) key research that considered the economic and social impact of climate change in Ireland on socially vulnerable groups including women, migrants, and adults with low level formal qualifications. This research indicated that these vulnerable communities often find themselves marginalised from decision-making due to a lack of access to information and poor-quality consultation processes that limit the expression of views.⁷⁵ In addition, Just4ALL recommended the engagement with Public Participation Networks to promote awareness and community engagement. There were also [significant deficits](#) in the approach to public participation adopted during the update of Ireland’s NECP. Ireland’s main body for citizen engagement and social dialogue in line with [principle four of its just transition framework](#), is the [National Dialogue on Climate Action \(NCDA\)](#). Ireland’s recent CAP25 stated that it is expanding the NCDA and community engagement through targeted workshops to ensure vulnerable communities remain central to the transition process.⁷⁶

Ireland’s Just Transition initiatives and the European Pillar of Social Rights Action Plan

The [European Pillar of Social Rights Action Plan \(EPSRAP\)](#), launched in March 2021, outlines initiatives to implement the [20 key principles](#) aimed at fostering a fair and inclusive European Union. The plan sets ambitious targets to be achieved by 2030, focusing on:

- Employment: Ensuring that at least 78% of people aged 20 to 64 are employed.
- Skills and Education: Guaranteeing that at least 60% of adults participate in training annually.
- Social Inclusion: Reducing the number of people at risk of poverty or social exclusion by at least 15 million.

The delivery on the Pillar is a joint effort by EU institutions, national, regional and local authorities, social partners and civil society. In June 2022, Member States were required to submit their own national targets to deliver on the European Pillar of Social Rights Action Plan by 2030. However, specific national targets submitted by Ireland are not readily available. The Commission submitted a [Country Report for Ireland in 2020](#) assessing progress on structural reforms, prevention and correction of macro-economic imbalances under [Regulation \(EU\) No 1176/2011](#). Ireland had one of the lowest rates of early school leaving in the EU, and higher education attainment but challenges were identified in regard to higher-than-average gender employment gap and concerns over child poverty with 1 in 4 children living in relative poverty.

Targets set out in the EPSRAP have clear and direct links with Ireland’s Just Transition initiatives. For example, initiatives set out in Ireland’s recent National Climate Action Plan and other plans such as the TTJP which aim to create new enterprise and employment opportunities in the Midlands, directly contribute to EPSR ambitious targets on employment. In regard to EPSR targets concerning skills and education, Ireland prioritises skills development through initiatives like [SOLAS’s National Further Education and Training Strategy for the Green Transition](#). In addition, Ireland’s Social Climate Plan must be compatible with the European Pillar of Social Rights to ensure it safeguards fundamental social needs, particularly housing, transport, and social inclusion.⁷⁷ This relates specifically to [Principle 20](#) of the EPSR which aims to guarantee access to essential services, including energy and transport, while [Principle 19](#) advocates for quality social housing and financial support to improve energy efficiency and reduce costs

⁷⁴ Article 23, Council Recommendation on ensuring a fair transition towards climate neutrality [2022] OJ C243.

⁷⁵ Sadhbh O’Neill et al., ‘Environmental Justice in Ireland: Key Dimensions of Environmental and Climate Injustice Experienced by Vulnerable and Marginalised Communities’ (Dublin City University and Community Law & Mediation 2022).

⁷⁶ Government of Ireland, *Climate Action Plan 2025* (2025).

⁷⁷ Regulation (EU) 2023/955 of the European Parliament and of the Council of 10 May 2023 establishing a Social Climate Fund.

for low-income households SCPs must address Principle 11, which focuses on poverty protection for disadvantaged communities, particularly as the ETS2 could lead to rising energy and transport costs.⁷⁸ SCPs should support sustainable and quality jobs in building renovation, energy efficiency, and clean mobility, aligning with the EPSR Action Plan, which seeks to reduce poverty and social exclusion for at least 15 million people by 2030.

However, in line with principles 2 and 3 of the EPSR (gender equality and equal opportunities), Ireland has continually failed to address gender inequality and the needs and perspectives of women and communities in its climate plans and policies. Furthermore, a [report](#) for the National Women's Council provided a baseline review of Irish environmental and climate policy from the perspective of intersectional feminist climate justice.⁷⁹ This report found that just transition in Ireland is still framed narrowly around employment and fails to capture and acknowledge the gender dimension - *"[n]ot applying an intersectional gender climate justice lens to just transition policy may result in the creation and implementation of strategies that are blind to intersecting inequalities experiences by women and other marginalised communities"*.⁸⁰ This needs to be addressed in both the review of the EPSRAP and the implementation of Ireland's just transition policies to meet social inclusion targets.

A comprehensive review of the EPSR Action Plan is [scheduled for 2025](#). This review will assess the progress made towards these targets and evaluate the effectiveness of the initiatives implemented. The findings will inform any necessary adjustments to ensure the successful realization of the 2030 objectives. The Commission released a [call for evidence](#) on June 2025 on the Action Plan for the European Pillar of Social Rights. This action plan could play a significant role in promoting a fair and just transition by introducing robust eco-social initiatives. Therefore, in addition to adhering to JT obligations laid out in national and EU legislation, Ireland should have due regard to EU council recommendation on ensuring a fair transition and honour its commitment to the European Pillar of Social Rights.

Just Transition initiatives and the Clean Industrial Deal

As demonstrated in this paper, Ireland's supranational obligations under EU law significantly guide its progress to fair and just transition. In recent months, the European Commission has unveiled several new strategies and plans, including [the Clean Industrial Deal \(CID\)](#). The CID is described as a transformational business plan that aims to strengthen Europe's industrial competitiveness while advancing decarbonisation efforts.

Part of these proposals includes the establishment of a Fair Transition Observatory which aims to improve anticipation and response to social impacts of the green transition. Similar to Ireland's Just Transition Commission at national level, this will strengthen the evidence base and develop key indicators to monitor and ensure a fair and just transition. Looking forward, it would be proactive of such a body to coordinate and collaborate closely with existing national bodies. The proposals under the CID include initiatives such as social leasing for zero-emission vehicles eligible under the Social Climate Fund, it is therefore important that this is considered in the drafting of Ireland's Social Climate Plan, including participative dialogue with key stakeholders and vulnerable communities to co-create solutions. Other key proposals include the development of a Quality Jobs Roadmap by end of 2025, to be prepared with social partners and an [Affordable Energy Action Plan](#). Ultimately, these proposals need to ensure cohesion and consistency with MS and that a just and fair transition is placed at the centre of the Clean Industrial Deal rather than "add-ons" only.⁸¹

⁷⁸ Catherine Devitt, 'What Ireland's Social Climate Plan Must Include: Six Key Priorities' (2025) EJNI Briefing Paper.

⁷⁹ Fiona Dukelow et al, 'Feminist Climate Justice Report' (2024)

⁸⁰ Ibid, 42.

⁸¹ For initial civil society reactions to the Clean Industrial Deal see EJNI's 'Research and Analysis of a Fair and Just Transition' [here](#).

Just Transition Policies and Initiatives in Northern Ireland

Context

After years of delays and prevarication, Northern [Ireland finally passed its first framework climate law](#) in 2022. The [Climate Change Act \(Northern Ireland\) 2022](#) establishes legally binding emissions reduction targets and governance arrangements to ensure these targets are met.

Although implementation of the Act has been the subject of [significant \(and ongoing\) delays](#), primarily as a function of the febrile nature of the devolved government in Northern Ireland, the Act contains a range of obligations on the NI government to establish a range of initiatives to help ensure a just transition for Northern Ireland. Efforts to deliver on these commitments are now [underway](#), however until implementation of the legal framework is more advanced, it is only possible to comment on the potential of these initiatives.

Just Transition Commission

Section 37 of the Climate Change (Northern Ireland) Act 2022 places a duty on the Department of Agriculture, Environment and Rural Affairs (DAERA) to establish a Just Transition Commission (JTC) for Northern Ireland. The JTC is designed to act as the main oversight and advisory body in relation to the just transition elements of the Act. No such body has been established three years on from the passing of the Act. Renewable NI has [highlighted](#) the impact of this delay *"the year-long hiatus at Stormont has, unfortunately, delayed both the creation of the Commission and delivery of the Just Transition and the Just Transition objectives. Northern Ireland is on the backfoot"*.

DAERA [opened a consultation](#) on the 11 November 2024 to gather views on the establishment of a JTC. More recently, the department published [a report](#) summarising responses and presents key findings and outcomes from the consultation and stakeholder engagement events. As the process of establishing the JTC continues, the exact powers and remit of this body will become clear - this will act as an indication of the extent of political commitment to a fair and just transition.⁸² The extent of cooperation with the parallel JTC in Ireland is also of critical importance. EJNI's response to the consultation recommended a high degree of cooperation with the JTC in the South to gain knowledge and expertise on how to tackle shared environmental issues across the island of Ireland - in particular on just transition issues. In addition, the JTC in Ireland has already stated that they will engage with the planned Just Transition Commission in the North, to further opportunities for cooperation on an all-island basis.⁸³

Next steps:

- DAERA [concluded](#) that the summary of responses to the consultation will be used to inform policy decisions and the draft regulations for the next stages of the legislative process.
- As per section 56(2) of NI's Climate Act, the UK's Climate Change Committee will be asked to review the draft regulations.
- The Regulations that will give effect to this body will first need to be agreed by the DAERA Minister and the NI Executive. The Regulations are required to be made by the draft affirmative procedure which means they will be brought to the Assembly to be approved through a debate, before they become law.

⁸² Jonny Hanson and Ann Marie Gray, 'Achieving a Just Transition in Northern Ireland', ARK Policy Brief (2024).

⁸³ Just Transition Commission of Ireland, 'Introductory Report of the Just Transition Commission of Ireland' (2025) 13.

Climate Commissioner

Northern Ireland's Climate Act mandates the creation of a Climate Commissioner, an independent office to oversee and report on the operations of this Act.⁸⁴ Earlier this year, members of the legislative assembly (MLAs) debated regulations suggested by NI's Executive office to establish the powers to appoint the Climate Commissioner. There was [pushback](#) from Stormont with regard to the establishment of a Climate Commissioner with the deputy first minister arguing that it is not needed and the estimated £1 million a year to fund the office was brought into question.

UK's Climate Change Committee drafted [a letter](#) in support of the draft NI Climate Commissioner Regulations (Northern Ireland) 2024, welcoming increasing scrutiny of the Act and an annual monitoring duty. The CCC recognised the potential overlap between its own role and the role of Climate Commissioner but simply suggested close cooperation to ensure effective delivery on climate change mitigation and adaptation.

Fuel Poverty and the Just Transition

The Department for Communities set up the "[Fuel Poverty and the Just Transition Project](#)" to provide a long-term framework for addressing fuel poverty in Northern Ireland, that recognises responsibilities under the Climate Change Act (NI) 2022. The Department opened a 12 week consultation on the 12th of December 2024 for the upcoming [NI's Fuel Poverty Strategy](#), the consultation was comprehensive, covering funding, definitions, eligibility criteria, the introduction of Minimum Energy Efficiency Standards and national retrofitting schemes etc. Read EJNI's response to the consultation [here](#) to find our key recommendations to ensure the fuel poverty strategy aligns with just transition principles.

An ARK policy brief "[Achieving a Just Transition in Northern Ireland](#)" based on a policy roundtable held with 20 diverse stakeholders in October 2024, found that failure to effectively address the extent of fuel poverty in NI and reliance on fossil fuels for home heating jeopardised the potential for a Just Transition.

The role of Equality and Impact Assessments in Northern Ireland

Section 75 of the Northern Ireland Act 1998 requires public authorities to have "due regard" to promoting equality and opportunity and good relations. Equality Impact Assessments (EQIAs) provide a mechanism for fulfilling this legal obligation. There is potential power in using EQIAs to assess inclusiveness and the promotion of equality in Northern Ireland's just transition policies. For example, ARK found that there's a case to be made that an equality impact assessment process should underpin the work of the Just Transition Commission.⁸⁵ In addition, the Northern Ireland Department of Housing [conducted an EQIA for the 2024-2025 budget](#). Stakeholders such as [National Energy Action \(NEA\)](#) criticized this assessment for overlooking critical issues such as fuel poverty, which disproportionately affects low-income households and marginalized communities. While EQIAs are integral to policy development in Northern Ireland, recent assessments suggest a need for more robust and inclusive approaches.

Just Transition Fund for Agriculture

S.31 of the Climate Change Act (Northern Ireland) 2022 requires DAERA to establish a 'Just Transition Fund for Agriculture' which aims to provide advice and financial assistance to the agricultural sector to help meet its targets set out in Climate Action Plans. Questions remain as to how this will be funded and when

⁸⁴ S. 50(1)(2) of Climate Change Act (Northern Ireland) 2022.

⁸⁵ Ibid (n83).

it will be set up and operational.⁸⁶ During Ministerial questions on the 10th of September 2024 DAERA Minister Muir advocated for a separate just transition fund that would sit outside the Common Agricultural Common Policy.⁸⁷ A 2024 NI Assembly [research paper](#) provides an analysis of Just Transition in Northern Ireland and details a range of considerations that require answering to ensure progress towards a fair and just transition in Northern Ireland, including questions around the lack of EU funding and how NI's Just Transition Fund for Agriculture will be set up.⁸⁸ This is an important component of Northern Ireland's Just Transition Policy considering NI's agriculture emissions are nearly three times that of the UK as a whole⁸⁹ and the move to net-zero economy will majorly impact employment in agri-food sector.

Conclusion

This paper provides an overview and analysis of the key just transition policies and initiatives across the island of Ireland. In Ireland, while there is certainly evidence of integration of just transition principles throughout the climate policy framework, further implementation is required. It is clear from this analysis that Ireland has not to date fully utilised opportunities stemming from EU supranational obligations (such as National Energy Climate Plans, Territorial Just Transition Plans etc.) to integrate JT obligations into its climate policy framework in a more consistent and coherent way. In addition, Ireland has failed to involve social partners in a real and meaningful way in the design and implementation of its climate plans and policies.

Arguably, (and as discussed in more detail in EJNl's briefing on just transition [legal obligations](#) on the island of Ireland) Northern Ireland's climate legislation more strongly integrates just transition obligations and principles compared to Ireland's legal framework - including supporting a just transition in sectoral plans, a requirement for the NI Department of Agriculture Environment and Rural Affairs (DAERA) to consult a Just Transition Commission when laying proposals for carbon budgets⁹⁰ and a requirement that each climate action plan must explain how the proposals and policies set out take account JT principles.⁹¹ However, progress in the implementation of Northern Ireland's climate law has been slow and Northern Ireland risks falling further behind in both meeting its climate targets and ensuring a just and fair transition.

Finally, it is widely [acknowledged](#) that climate change on the island of Ireland is a shared challenge, and therefore adaptation delivery and implementation on both sides of the border will require strong cross-border collaboration and cooperation.⁹² The delays in implementing Northern Ireland's climate law, in particular the delay establishing a Just Transition Commission, means that there is a vacuum that has implications on an all-island basis because in Ireland a Just Transition Commission has already been established⁹³ and without a counterpart in Northern Ireland acting as a champion for a fair transition a 'two-speed' transition could occur on the island. This could result in significant disadvantages for citizens and communities where the impact of the transition will be felt most acutely in Northern Ireland compared to Ireland including creating societal division, further disruptions to the level playing field and establishing additional barriers to all-island cooperation across a range of sectors.

⁸⁶ Susie Cave, 'Just Transition: Background and Examples' Research and Information Service Research Paper for the Northern Ireland Assembly (2024).

⁸⁷ Official Report (Hansard) Tuesday 10 September 2024 Volume 162, No 4 p.37-39 plenary-10-09 2024.pdf (niassembly.gov.uk)

⁸⁸ Ibid (n86) 16.

⁸⁹ Aoife Ní Lochlainn 'Supporting People and Place: Planning for a Just Transition in Northern Ireland' (2020), NERI Working Paper Series No. 71, 11.

⁹⁰ Section 30(2)

⁹¹ The just transition principle is defined in detail in section 30(3) of the Act and sets out 11 objectives.

⁹² Climate Change Committee, 'Adapting to Climate Change: Progress in Northern Ireland', (2023) at: <https://www.theccc.org.uk/wp-content/uploads/2023/04/Adapting-to-climate-change-Progress-in-Northern-IrelandWeb.pdf>.

⁹³ <https://www.gov.ie/en/campaigns/9e9d4-just-transition-commission/>