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A collection of dark purple silhouettes of people of various shapes and sizes, some holding rectangular signs, arranged in a circular pattern around the central text box.

RESPONSE TO CALL FOR EVIDENCE: EUROPEAN PILLAR OF SOCIAL RIGHTS ACTION PLAN

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The [European Pillar of Social Rights](#) is designed to act as the EU's blueprint for a 'fairer and more inclusive Europe that protects its citizens while contributing to better living and working conditions'. The first Action Plan to turn the principles of the Pillar into concrete actions was produced in 2021. The European Commission is now consulting on a new action plan which aims to 'go further in implementing the European Pillar of Social Rights and help EU countries, within the parameters of their social models, reach the EU's 2030 headline social targets'. This document sets out Environmental Justice Network Ireland's response to the European Commission's [Call for Evidence](#), open until 10th September 2025.

[Environmental Justice Network Ireland](#) promotes strategic collaboration between researchers, civil society, lawyers and communities to address the root causes of environmental and social injustice on the island of Ireland and beyond, for a peaceful society, a healthy democracy, protection of rights and a just transition.

Assessing National Implementation of the European Pillar of Social Rights Action Plan (EPSRAP) in Ireland

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 yet publicly available. Therefore, it is difficult for civil society organisations to measure Ireland's progress and implementation of the EPSR action plan.

Links between the EPSRAP and Ireland's Just Transition Initiatives

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 [Territorial Just Transition Plan](#) which aim to create new enterprise and employment opportunities in the Midlands, directly contribute to EPSR ambitious targets on employment. Regarding EPSR targets concerning skills and education, Ireland prioritises skills development through initiatives like SOLAS's (SOLAS is the state agency responsible for Further Education and Training (FET) in Ireland) 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. 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 for low-income household's 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. SCPs should support sustainable and quality jobs in building renovation, energy efficiency, and clean mobility, aligning with key targets in the EPSR Action Plan that aims for at least 78% of the population aged 20 to 64 to be in employment by 2030.

Energy Poverty and the EPSRAP in Ireland

However, a significant barrier to the delivery and implementation of the EPSRAP in Ireland has been the [failure to address the structural causes of energy poverty](#) and adhere to energy poverty obligations at EU level (see EJNI's [analysis](#) on Ireland's National Energy and Climate Plan). On the 18th of August 2025, a joint letter signed by environmental and social justice CSOs was sent to Ireland's Minister for Climate, Energy and the Environment, raising serious concerns regarding the decision to replace the long-promised Energy Poverty Action Plan (EPAP) with the broader 'Energy Affordability Action Plan' and the establishment of the National Energy Affordability Taskforce (NEAT) without civil society representation. While we welcome efforts to ensure energy affordability and protect consumers during the energy transition, the discontinuation and replacement of the dedicated Energy Poverty Action Plan undermines longstanding commitments to address the structural, intersectional, and justice-based dimensions of

energy poverty in Ireland. The new framing of 'energy affordability' risks sidelining the most vulnerable in society, including disabled people, older people, single-parent families, migrants, Travellers, and renters. Energy poverty is not only a matter of high bills but of income inequality, poor-quality housing, and energy-inefficient rental stock.

"The EPAP was intended to provide a roadmap to tackle these structural causes. The new Taskforce appears focused on price reviews and competitiveness rather than targeted, rights-based interventions. There is little indication that NEAT will address energy poverty as a climate justice issue - one that demands a just deployment of retrofitting resources, renewable heat access, and consumer protections as fossil fuels are phased out. There is a notable shift in emphasis from these structural solutions toward short-term affordability and support for businesses. While important, these broader objectives must not come at the expense of targeted, long-term support for energy-poor households."

Equally pressing, Ireland's recent [National Energy and Climate Plan \(NECP\)](#) update relied heavily on EPAP measures yet did not include the national indicative objective to reduce energy poverty required by Article 3(d) of the Governance Regulation. The European Commission explicitly urged all Member States, in its guidance for the NECP updates, to set such an objective, particularly "considering the current spike in energy prices." Moreover, in its [formal assessment](#) of Ireland's updated NECP, the Commission found that the plan neither assessed impacts on vulnerable groups nor provided a credible basis for Ireland's upcoming Social Climate Plan.

Therefore, we express particular concern about the delay in approving Ireland's SCP. There is a significant amount of funding at stake that could be directed at eliminating energy and transport poverty (in line with key principles and targets of the EPSR and corresponding Action Plan). Existing research shows a correlation between poor access to public transport, energy poverty and socioeconomic disadvantage. [A baseline study conducted for the Feminist Communities Climate Justice project](#) has found that women and marginalised communities - in particular, lone parents, older people and people with disabilities are especially at risk of energy and transport poverty. 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". This needs to be addressed in the review of the EPSRAP and design of the next EPSR action plan; to meet social inclusion targets and 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.

We note that in the context of the "rapidly evolving socio-economic, labour market, demographic and geopolitical context", the Commission aims to reflect the close links between competitiveness, preparedness, democracy and high social standards in the next Action Plan. The next Action Plan could therefore play a significant role in promoting a fair and just transition by introducing robust eco-social initiatives. However, the [Clean Industrial Deal](#) (the EU's strategy for increasing competitiveness through reindustrialisation while achieving climate neutrality by 2050) leaves significant gaps in social protections and risks exacerbating inequalities unless strengthened. In fact, while the European Affordable Housing Plan is mentioned, the European Pillar of Social Rights is notably absent in the CID. To ensure synergy between the CID and the EPSR, the CID [must adopt robust and targeted initiatives](#) to support workers, consumers, communities and marginalised groups and this must also be reflected in the next EPSRAP to ensure they are mutually reinforcing. For example, the next EPSRAP must demonstrate how CID initiatives such as the Quality Jobs Roadmap and Union of Skills will interact with the actions laid out in the EPSR plan. The EU must avoid exacerbating regional disparities and ensure that industrial policy generates social benefits and protects workers by structurally embedding strong social and environmental conditions within the EU's industrial policy framework.

Since the development of the European Green Deal, an EU Just Transition Framework has gradually emerged, including funding such as the Just Transition Fund and Social Climate Fund aimed at ensuring member states can address the socio-economic challenges of the green transition. Without Ireland's Social

Climate Plan, we are unable to see the extent to which Ireland intends to use funds from SCF to address the identified social deficits in their plans up to 2032. Moreover, we have concerns regarding the disappearance of the Just Transition Fund and current discussions on the next EU Multi-Annual Financial Framework, which call into [question](#) the EU's ability to financially implement just transition policies in the future. The next EPSR action plan must therefore be supported by sufficient funding, including the competitiveness fund, for Member States to implement the plan.

The [European Social Observatory](#) argues that the linkages between the EU green transition policies and social policies can be strengthened by ensuring that the upcoming EPSRAP has a "*strong focus on socio-ecological issues*". EJNI strongly supports the following 12 core policy recommendations made by the OSE for concrete initiatives to strengthen the socio-ecological dimension of the new EPSR Action Plan:

On social and civil dialogue:

R1. Developing EU Guidelines on stakeholders' involvement in transition processes and closely monitoring the implementation of these Guidelines.

On legislative initiatives:

R2. Setting up a High-Level Group on 'eco-social policies', to investigate new eco-social risks and advise on ways to adapt welfare states to the challenges of the clean transition, climate change, and environmental degradation.

R3. Further developing more systematic and comprehensive ex-ante and ex-post measurements of the distributional and wider socio-economic impacts of climate and environmental initiatives as well as of the socio-economic impact of climate change and environmental degradation.

R4. Defining criteria to assess the potential environmental impact of welfare policies and ensuring that future EU social initiatives always include integrated socio-ecological measures and more 'environmentally sustainable' options.

R5. Revamping and expanding European directives on health and safety at work in light of the new challenges posed by climate change and environmental degradation.

R6. Exploring the possibility of an 'enhanced job guarantee' for workers in territories and sectors that are more vulnerable to the transition towards a decarbonised economy.

R7. Elaborating a legislative initiative on just transition, possibly an EU Directive, to provide Member States with clear guidelines on the content and governance principles that should characterise national just transition strategies.

On EU funds:

R8. Exploring options for setting up an enhanced JTF 2.0 or earmarking sufficient money for just transition-related issues in the new MFF post- 2027, including the Competitiveness Fund.

R9. Exploring options for earmarking funding for the implementation of welfare reforms in line with the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality, as well as experimenting with more innovative and integrated eco-social policies.

On EU economic governance:

R10. Considering how the European Semester procedures could be used to monitor Member States' implementation of the 2022 Council Recommendation on ensuring a fair transition towards climate neutrality.

R11. Exploring how the planned review of the Governance Regulation could support the development, implementation and monitoring of just transition policies at EU and national levels, while using the European Semester to streamline reporting obligations for Member States.

R12. Elaborating integrated indicators on emerging socio-ecological risks and on the social impact of green transition policies and exploring if some of these indicators could be included in the EPSR's Social Scoreboard and used in the European Semester (including in the Social Convergence Framework).