
Consultation on the Department of the Environment, Climate and Communications Statement of Strategy 2025- 2028

**Response from the American Chamber of Commerce Ireland
(AmCham) to the Department of Environment, Climate and
Communications on the Statement of Strategy 2025 – 2028.**

April 2025

The American Chamber of Commerce Ireland

The Voice of US-Ireland Business

The American Chamber of Commerce Ireland (AmCham) is the collective voice of US companies in Ireland and the leading international business organisation supporting the Transatlantic business relationship. Our members are the Irish operations of all the major US companies in every sector present here, Irish companies with operations in the United States and organisations with close linkages to US-Ireland trade and investment.

The American Chamber of Commerce Ireland (AmCham) welcomes the opportunity to make a submission to the consultation on the review of the Department of Housing, Local Government and Heritage's Statement of Strategy for the period 2025 – 2027.

The Department's portfolio covers key areas in the effort to support Ireland's continued development of critical infrastructure that will support Ireland in maintaining its competitiveness as a location for inward investment, business growth and talent. While overcoming these challenges is of significant importance, 9 out of 10 respondents to a recent AmCham survey reported that their corporate headquarters have a positive view of Ireland as an investment and growth location. Through the implementation of effective policies, Ireland can maintain its position as a leading destination for talent and business in the years to come. Core to this goal will be the timely delivery of critical infrastructure and policies that support Ireland's continued growth.

Strategic Goal 1

As identified in Strategic Goal 1, under the Department's Statement of Strategy 2024 – 2025, entitled 'Le Chéile 25', which aims to achieve, *"a just transition to net zero greenhouse gas emissions no later than 2050 with a 51% reduction in our overall greenhouse gas emissions in the period 2021 to 2030. We are adapting and building resilience to the locked-in impacts of climate change. We have an empowered and pro-active society building sustainable communities and businesses. We are maximising economic opportunities"*, Ireland's ability to continue to foster economic growth, while also meeting its national and international climate action targets, must be achieved in a way that brings Government, the business community, and society together in a clear, consistent and flexible manner.

The implementation of projects stemming from the EU Just Transition Fund and related Government funding, aimed at diversifying the local economies of affected areas through investment in SMEs and key sectors is a beneficial step in encouraging job growth and supporting the development of a culture of innovation in these regions, particularly with respect to the green economy. The implementation of these local and regional economic development plans should be continued and their impacts assessed in order to maximise their effectiveness. This would further support the development of a vibrant and dynamic business ecosystem.

With regard to carbon budgets, there is a need for continued engagement between the State and industry in order to develop achievable emissions reductions and continue to foster innovation and economic advancement. Maintaining open dialogue between the public and private sector is key to addressing concerns and support the adaption of emerging technologies and innovations that will aid in reaching our national targets.

Further, the development of sectoral adaption plans must be done in a manner that reflects achievable, effective goals and targets. This is done best when industry and relevant sectors are engaged and have the opportunity to contribute to the policy development process. Harnessing the knowledge and expertise of industry will allow for greater impact and coordination across sectors and wider society. Moreover, engaging with key sectors and industry to develop and implement research, and innovation strategies encourages further opportunities to tackle mutual challenges.

Strategic Goal 2

Under the current Strategic Goal 2, and its aim to deliver “*secure, sustainable, competitive and affordable energy supplies for households, businesses, communities and public organisations as a vital component to the prosperity of Ireland’s economy and society*”, and to “*drive delivery of renewable and energy efficiency targets*”, a number of key issues can be identified and addressed.

Ireland has significant renewable energy targets running to 2030 and beyond, including reaching 80% renewable electricity by 2030, and generating 5GW of offshore wind energy by 2030. While there has been significant progress in recent years with regard to Ireland’s renewable energy production, a continued focus on these targets, the related policies, and timely interventions can prevent stagnation or backsliding on progress and continue to drive Ireland forward.

Addressing key delays within the planning system will be key to seeing large green energy generation projects progress in Ireland and importantly send a clear signal to international investors that Ireland is a viable location for green energy projects. Continued efforts must be made to address the delays in the planning system, with 10 wind farms granted planning permission in 2024 by An Bord Pleanála, these projects have a combined potential of 717MW, accounting for 42% of what is needed to keep Ireland on track to hit 2030 targets. Addressing bottlenecks in the planning system can ensure

that projects are delivered in a timely manner and to support Ireland in achieving its 2030 targets.

A significant increase in investment in the electricity grid is necessary in order to meet existing demand and build capacity for greater energy demand and the generation trends anticipated in the coming years. Estimates range from annual investments of €1.1 billion to €2 billion per annum to 2030. The development of innovation and digitalisation in the electricity grid is also an important factor in addressing current strains on the electricity grid.

Enhancing Ireland's solar and wind production will require a continued prioritisation of grid capacity and investment, increasing advancement in energy storage capabilities, and addressing supply chain challenges facing the sector.

The development of district heating in Ireland will be key to driving new methods of heating cost reduction, increasing security of supply and providing for low carbon heating across homes and businesses. This will require continued effort to progress the regulatory and legislative framework in relation to harnessing the potential of district heating in Ireland. The development of long-term strategies in relation to district heating will be fundamental to increasing confidence and forecasting in the business community.

Strategic Goal 4

Under the current strategy, Strategic Goal 4 aims to deliver an *“agile, responsive and resilient digital infrastructure in place supporting the transformation of the digital economy for the benefit of every citizen, business, and community in Ireland”*, this is a fundamental aim in creating an innovative and competitive economy, and to maintain and enhance Ireland's attractiveness as a destination for FDI.

The digitalisation of Ireland's economy presents significant opportunities to the national economy and can position Ireland as a leader in economic digitalisation on the international stage. The significant progress made under the National Broadband Plan (NBP) is noted and the momentum behind to NBP to complete its task of delivering 400,000 homes with high-speed broadband by the end of 2025 is encouraging. Furthermore, efforts to provide gigabit broadband connections to all premises by 2028, and 5G mobile connection to all populated areas by 2030, in line with digital connectivity targets compliment the progress being made under the NBP. In-built reviews and

implementation analysis would prove beneficial as these projects are rolled out and allow for early identification of bottlenecks and emerging issues. This approach was successfully implemented in the roll out of the NBP to date.

The development of subsea cables connecting Ireland directly to Europe, will further enhance Ireland's position as a strategic partner in the digital economy and increasingly develop Ireland's role as a digital gateway to the European Union. In this context it is equally important to note that almost one half of Ireland's existing subsea cables are over two decades old, this presents end-of-use challenges and underscores the need for ongoing investment and development in the subsea cable infrastructure.

Subsea cables, which carry 99% of all international telecommunications traffic for public, commercial, and governmental use, are a significant piece of Ireland's critical infrastructure, this underscores the need for the maintenance, security, and future investment in subsea cables to form part of Ireland's international connectivity strategy.

Strategic Goal 5

The existing Strategic Goal 5 intends to provide for *“increased national cyber security through active defence, improved compliance and resilience, and enhanced prevention, detection, monitoring, analysis and mitigation”*. Boosting Ireland's national cyber security infrastructure is crucial to providing the protections and supports necessary to attract international investment in tandem with the digitalisation of the economy.

A continued effort to enhance the scope and capabilities of the National Cyber Security Centre (NCSC) will be key to delivering on the aims of strategic Goal 5. This will include adequate resourcing in staffing and technological capabilities to mitigate risks through monitoring, detection and prevention of potential cyber-attacks. This is of paramount importance as cyber security threats present significant challenges to areas including, but not limited to, energy security, financial services, transport and supply chains, healthcare, and more.

Further to this goal, it is important that as the policy framework is develop in the advent of NIS2, that industry and key stakeholders are engaged with, and that the business community has an opportunity to contribute to frameworks that protect against risks and do not unduly burden businesses in administrative processes.

Supporting the development of a culture of cyber security across society and the SME sector is another step toward achieving greater layers of security within the State. This includes investment and support programmes assisting the SME sector in increasing their cybersecurity preparedness, as well as developing a whole of Government approach to the issue of cyber defence. These goals will be further enhanced through the fostering of an Irish based cyber security industry, leading research, development and innovation in this sector.