

Public Consultation on the Net-Zero Industry Act

Response from the American Chamber of Commerce
Ireland (AmCham) to the Department of Enterprise,
Trade, and Employment's public consultation.

May 2023

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.

Pillar 1 - Setting enabling conditions

AmCham welcomes the Commission's recognition of the importance of having optimum conditions as a prerequisite to investment in net-zero technologies. In particular, the need for reducing the administrative burden is key to ensuring that projects can be completed within a reasonable timeframe and without adding too much additional work for companies. One of the biggest hurdles to accelerating Ireland's net zero journey has been the logjams created by the planning system, in this regard AmCham will engage on the further development of the Draft Planning Reform Bill, and planning reform, domestically.

Likewise, AmCham acknowledges the Commission's focus on simplifying permit-granting processes, including establishing a single point of contact in Member States for permitting, the introduction of limits on the permit-granting processes for net-zero manufacturing projects, and the establishment of a fully online permitting procedure. The implementation of these measures must be focused on streamlining the process, and accelerating Ireland and Europe's net-zero journey.

AmCham further acknowledges the suggestion that certain Net-Zero Strategic projects should be prioritised, based on their centrality to building the EU's resilience and competitiveness. AmCham suggests that greater clarity regarding the criteria against which projects will be measured would be beneficial. In this regard, what constitutes a project of 'overriding public interest' needs to be clearly defined to avoid confusion in any decision-making process related to the prioritisation of projects.

Pillar 4 - Enhancing skills

As is the case in many industries at present, a significant skills gap has arisen in relation to sustainability. AmCham members have consistently identified talent attraction and skills shortages within the top three greatest challenges for Ireland to overcome to maintain its attractiveness as a location for inward investment.

Given the scale of mobilisation required to achieve net zero, efforts must be made to lessen the skills gap within the sustainability space. The European Net Zero Academies is therefore a welcome addition to the Net-Zero Industry Act. AmCham particularly appreciates the idea that the European Net Zero Industry Academies will aim to be as inclusive as possible and pay particular attention to the need to activate more women and young people, who are not in education, employment or training for the labour market. AmCham notes the importance of measures which empower those entering the workforce to realise their potential through an alternative educational pathway, whilst supplementing existing tertiary educational options. Detail on how this will be achieved will be essential in terms of providing clarity for business. Further, details in relation to

how a European Net Zero Academy would function in Ireland, in addition to clarity as to where functional responsibility for such an academy would lie is required.

Pillar 5 - Fostering innovation

Fostering innovation will be key to achieving net-zero. In the past AmCham has stressed that Ireland's ambitions should not be curtailed by the limitations of the technology of today, but rather innovation to deliver new greener technologies must be supported. There is need for greater collaboration between industry, research, and policymakers in order to make best use of the knowledge and opportunities that exist in this area. AmCham notes the possibility of introducing net-zero regulatory sandboxes, as detailed in the act. Ireland should examine this in the context of strengthening its position as a hub for research and innovation in the net-zero space.

Pillar 6 - A Net-Zero Europe Platform

AmCham welcomes the introduction of a Net-Zero Europe Platform, as information sharing between member states serves to benefit all those involved. AmCham further supports the idea of the Commission and Member States working together to ensure the availability of data to monitor progress.

In its Sustainable Energy White Paper¹, AmCham notes how the provision of such metrics in a timelier manner would be greatly beneficial, given the need to examine past outcomes and the importance of that data in informing forthcoming actions. Urgency on receiving this data is essential: it will provide momentum to do more and will provide best practice models for fellow Member States to learn from.

AmCham similarly supports the notion of paving the way for the adoption of net-zero technologies globally. Whilst a resilient and competitive EU is essential, it is important not to lose sight of the shared net-zero aims of likeminded countries. It is important to have continued cooperation between the EU and the US, through avenues such as the Trade and Technology Council, to ensure that the shared aim of decarbonisation is accelerated.

¹ White Paper on Sustainable Energy: Powering Ireland into the Future, <https://www.amcham.ie/posts/white-paper-on-sustainable-energy-powering-ireland-into-the-future/>