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Minister Eamon Ryan
Department of the Environment, Climate and Communications, 29-31 Adelaide Road, Dublin 2, D02 X285
and minister.ryan@decc.gov.ie

C.C.
Taoiseach Micheál Martin
Department of the Taoiseach, Government Buildings, Merrion Street Upper, Dublin 2
and micheal.martin@oireachtas.ie

Tánaiste Leo Varadkar
Department of Enterprise, Trade and Employment, 23 Kildare Street, Dublin 2
and leo.varadkar@oireachtas.ie

Date: 26th April 2021

Dear Minister Ryan,

Request to address the unintended negative consequences of changes to the SEAI 'COMMUNITIES' GRANT SCHEME

I am writing to you on behalf of the EcoMerit Community¹. We are a group of over 100 environmentally-aware Irish Enterprises who have achieved a 9% year-on-year reduction in our emissions since 2010. We welcome new opportunities for communities to decarbonise in line with science-based targets to meet the Paris Agreement and the EU Green Deal. However, we are extremely concerned about the worrying policy emerging from the DECC regarding access to SEAI 'Communities' grants.

Previously these grants were open to all Communities including the EcoMerit Community.

The DECC now requires **all** SEAI 'Communities' grant applications to include domestic premises. Our community (which is a SEAI-registered Sustainable Energy Community) does not include domestic premises. Our successful grant application this year required us to recruit a householder purely to meet this new grant requirement. This presented us with an additional difficulty in what is already a difficult and demanding process.

On 10th March 2021 we were advised by SEAI that it is now DECC policy for all future SEAI 'Communities' grant applications to include **a significant number** of domestic dwellings. If so, that will effectively exclude our community. Many other SMEs and charitable organisations will be similarly excluded.



We feel sure that this must be unintentional and we ask you to reverse this policy and its catastrophic effect on our community.

We originally raised this matter with SEAI in November 2020. They informed us that they had already advised DECC against this approach and that *'the only way to have this reviewed would be for the Minister to recommend changes'*.

If the policy remains in place, it will end a continuous run of successful EcoMerit 'Communities' grant projects every year since 2012 when the first SEAI 'Communities' grant scheme was launched. Over the last ten years the EcoMerit Community has achieved a 9% year-on-year reduction in our carbon footprint². We have spent the last ten years out-performing the ambitious targets set out in the anticipated Climate Action and Low Carbon Development (Amendment) Bill 2021. Around half of that improvement can be directly attributed to the SEAI 'Communities' grant projects implemented across 53 of our members' sites.

However, the implications extend well beyond our small community.

- This policy will also undermine the laudable new 'Green for Micro' initiative launched nationwide by the Tánaiste. The inevitable result will be greatly improved SME awareness of the sustainability improvements they can make, followed by denial of access to the grant funding which could make them a reality.
- The important Climate Change role SMEs can play has been highlighted in the research leading to the CARE³ proposal which is currently under consideration by the DECC. It has been established that SMEs are responsible for 70% of industry-related emissions in the EU ^{4,5}.
- The policy will also disadvantage larger businesses and organisations who wish to play their full part in meeting Ireland's Climate Change obligations, as they also will be largely excluded.

By making you aware of the full implications we feel sure you will wish to make a positive intervention.

We trust we may have your support in this matter and we would welcome the opportunity to meet with you and explore the way ahead.

Yours sincerely,

Phil Walker

Managing Director, EcoMerit Ltd. and EcoMerit Community Oversight Board Member

Christian Kubernat Technical Director, EcoMerit Ltd.

Bobby Lambert, Business Development Director, EcoMerit Ltd.

And the EcoMerit Community Oversight Board (see over)



James Hogan *B.Sc. (Env. Sci. & Tech).*

Chair of the Board

Project leader, Clean Technology Centre, Cork Institute of Technology

Leonard Kelly *Post Grad Diploma in Adult Guidance Counselling, BSc Quality Management, BA in Counselling and Psychotherapy* **Board Member**

Camillus Muldowney *B.E. PhD CMC FIC MIEI*

Board Member and Independent Consultant, Energy Efficiency Engineer

Fionnuala Murphy *PhD, B.E. Biosystems Engineering*

Board Member and Lecturer at School of Biosystems & Food Engineering, University College Dublin

Michelle O'Sullivan *Masters in Sustainable Development, BA Business Studies & Personnel Management*

Board Member and Senior Public Affairs Officer, Cork Chamber

Seán Aylward *MSCSI MRICS BCSC Dip SCM,*

Board Member and Retired Shopping Centre Manager, Nutgrove Shopping Centre, Dublin

Maura Bell

Board Member and Former Manager Irish National Heritage Park, Wexford

Sinéad Mitchell *B.E. PhD (Industrial Engineering), Member of Engineers Ireland*

Board Member and Lecturer in Engineering at National University of Ireland Galway

Reference Information:

Reference 1 The EcoMerit Community

<https://ecomerit.ie/structure/>

Reference 2 EcoMerit Emissions Performance

<https://ecomerit.ie/performance/>

Reference 3 Climate Action by Resource Efficiency (CARE) Proposal

<https://ecomerit.ie/wp-content/uploads/2020/07/CARE-Proposal-20200717.pdf>

Reference 4 Constantinos, C., Sørensen, S. Y., Larsen, B. P. & Alexopoulou, S., 2010. *SMEs and the Environment in the European Union*, Copenhagen, Denmark: European Commission, DG Enterprise and Industry.

Reference 5 Mitchell, S., O'Dowd, P Dimache, 2020 A. Manufacturing SMEs doing it for themselves: Developing, testing and piloting an online sustainability and eco-innovation toolkit for SMEs . *International Journal of Sustainable Engineering* 13 (2020), pp. 159 - 170, 10.1080/19397038.2019.1685609