

Assessing Administrative Burdens as Barriers to Implementation of Ireland's Climate Action Plan

Authors: Cara Augustenborg, Patricia Lentz, Leonhard Lades, Margaret Samahita and Lucie Martin

Lead organisation: University College Dublin



Environmental Protection Agency

The EPA is responsible for protecting and improving the environment as a valuable asset for the people of Ireland. We are committed to protecting people and the environment from the harmful effects of radiation and pollution.

The work of the EPA can be divided into three main areas:

Regulation: Implementing regulation and environmental compliance systems to deliver good environmental outcomes and target those who don't comply.

Knowledge: Providing high quality, targeted and timely environmental data, information and assessment to inform decision making.

Advocacy: Working with others to advocate for a clean, productive and well protected environment and for sustainable environmental practices.

Our Responsibilities Include:

Licensing

- > Large-scale industrial, waste and petrol storage activities;
- > Urban waste water discharges;
- > The contained use and controlled release of Genetically Modified Organisms;
- > Sources of ionising radiation;
- > Greenhouse gas emissions from industry and aviation through the EU Emissions Trading Scheme.

National Environmental Enforcement

- > Audit and inspection of EPA licensed facilities;
- > Drive the implementation of best practice in regulated activities and facilities;
- > Oversee local authority responsibilities for environmental protection;
- > Regulate the quality of public drinking water and enforce urban waste water discharge authorisations;
- > Assess and report on public and private drinking water quality;
- > Coordinate a network of public service organisations to support action against environmental crime;
- > Prosecute those who flout environmental law and damage the environment.

Waste Management and Chemicals in the Environment

- > Implement and enforce waste regulations including national enforcement issues;
- > Prepare and publish national waste statistics and the National Hazardous Waste Management Plan;
- > Develop and implement the National Waste Prevention Programme;
- > Implement and report on legislation on the control of chemicals in the environment.

Water Management

- > Engage with national and regional governance and operational structures to implement the Water Framework Directive;
- > Monitor, assess and report on the quality of rivers, lakes, transitional and coastal waters, bathing waters and groundwaters, and measurement of water levels and river flows.

Climate Science & Climate Change

- > Publish Ireland's greenhouse gas emission inventories and projections;

- > Provide the Secretariat to the Climate Change Advisory Council and support to the National Dialogue on Climate Action;
- > Support National, EU and UN Climate Science and Policy development activities.

Environmental Monitoring & Assessment

- > Design and implement national environmental monitoring systems: technology, data management, analysis and forecasting;
- > Produce the State of Ireland's Environment and Indicator Reports;
- > Monitor air quality and implement the EU Clean Air for Europe Directive, the Convention on Long Range Transboundary Air Pollution, and the National Emissions Ceiling Directive;
- > Oversee the implementation of the Environmental Noise Directive;
- > Assess the impact of proposed plans and programmes on the Irish environment.

Environmental Research and Development

- > Coordinate and fund national environmental research activity to identify pressures, inform policy and provide solutions;
- > Collaborate with national and EU environmental research activity.

Radiological Protection

- > Monitoring radiation levels and assess public exposure to ionising radiation and electromagnetic fields;
- > Assist in developing national plans for emergencies arising from nuclear accidents;
- > Monitor developments abroad relating to nuclear installations and radiological safety;
- > Provide, or oversee the provision of, specialist radiation protection services.

Guidance, Awareness Raising, and Accessible Information

- > Provide independent evidence-based reporting, advice and guidance to Government, industry and the public on environmental and radiological protection topics;
- > Promote the link between health and wellbeing, the economy and a clean environment;
- > Promote environmental awareness including supporting behaviours for resource efficiency and climate transition;
- > Promote radon testing in homes and workplaces and encourage remediation where necessary.

Partnership and Networking

- > Work with international and national agencies, regional and local authorities, non-governmental organisations, representative bodies and government departments to deliver environmental and radiological protection, research coordination and science-based decision making.

Management and Structure of the EPA

The EPA is managed by a full time Board, consisting of a Director General and five Directors. The work is carried out across five Offices:

1. Office of Environmental Sustainability
2. Office of Environmental Enforcement
3. Office of Evidence and Assessment
4. Office of Radiation Protection and Environmental Monitoring
5. Office of Communications and Corporate Services

The EPA is assisted by advisory committees who meet regularly to discuss issues of concern and provide advice to the Board.

Assessing Administrative Burdens as Barriers to Implementation of Ireland's Climate Action Plan

Authors: Cara Augustenborg, Patricia Lentz, Leonhard Lades, Margaret Samahita and Lucie Martin

Lead organisation: University College Dublin

What did the research aim to address?

This research assessed how administrative burdens¹ act as barriers to implementation of climate action plans. While effective policy design receives significant attention, less is known about hidden implementation obstacles such as unclear guidance, complex paperwork and delays. These burdens can discourage participation, particularly among resource-constrained groups. The project is relevant to policymakers, public service administrators and civil society groups seeking to improve policy uptake, equity and climate action delivery. It addresses a key knowledge gap by identifying where administrative burdens occur and how they affect behaviour and access. Using an innovative mixed-methods approach, the project combined behavioural science with environmental policy to screen climate actions, audit three priority schemes, gather stakeholder insights and test behavioural impacts through surveys and experiments. It is one of the first studies globally to apply these tools to environmental policy implementation.

What did the research find?

Administrative burdens were most pronounced at key implementation stages of climate schemes, where they delayed progress and discouraged participation. Three of Ireland's climate action schemes were analysed in depth: the Afforestation Scheme 2023–2027, the Solar for Schools Programme and the Shared Island Sports Club EV Charging Scheme. Burdens included long delays, unclear timelines and overly complex processes, which were especially onerous for volunteers, landowners and schools with limited capacity. A nationally representative survey and behavioural experiment

showed that complex documents and poorly designed systems reduced comprehension and engagement, particularly for those with lower digital and administrative literacy levels. Stakeholder interviews highlighted systemic barriers, including excessive paperwork, poor communication and limited staffing. These findings fill a gap in climate policy research by showing how behavioural and administrative design affects implementation. The project produced three policy briefs and a stakeholder insights paper, and applied a novel “sludge audit”² method adapted for environmental policy, offering the first practical evidence to guide administrative burden reduction in Irish climate delivery.

How can the research findings be used?

The findings offer a practical evidence base for reducing administrative burdens in climate policy, improving accessibility, equity and scheme uptake. We demonstrated how government departments and agencies can apply the “sludge audit” method to assess and streamline processes. The research also recommends clearer communication with applicants and targeted process improvements to reduce delays and confusion. These insights could inform future revisions of Ireland's Climate Action Plan. More broadly, the findings are particularly relevant to policymakers designing schemes, public servants overseeing delivery and researchers evaluating programme performance. Ultimately, the research supports more user-centred policy design to help Ireland achieve its climate targets more effectively.

1 Administrative burdens, also known as “administrative frictions” in the academic literature, are onerous personal experiences of policy implementation, such as complex application forms, unclear guidance, long waiting periods or excessive effort required to learn about a programme. In the context of the climate and environment, administrative burdens can deter environmental scheme participation, slow progress towards environmental targets and impact resource-constrained groups that already suffer disproportionately in terms of environmental degradation. Interest in administrative burdens is increasing worldwide as governments and international organisations aim to understand how burden reduction initiatives can improve processes.

2 In parallel to research on administrative burdens, research on behavioural public policy has begun investigating “sludge”, defined as “unnecessary frictions that make it harder for people to do what they want”. Sludge is broader than administrative burdens, as it occurs in both public and private sectors (e.g. hard-to-cancel subscription plans rely on sludge to retain customers) and is closely linked to “nudging” and behavioural economic insights that humans are different from the perfectly rational agents that exist only in economics textbooks. Thus, small and supposedly irrelevant factors, such as administrative burdens, can have large behavioural effects. Rather than nudging people towards more desirable or sustainable choices, sludge can be detrimental to people's preferences or best interests.

EPA RESEARCH PROGRAMME 2021–2030

Assessing Administrative Burdens as Barriers to Implementation of Ireland’s Climate Action Plan (2022-CE-1149)

EPA Research Report

Independent scientific research funded
by the Environmental Protection Agency

Prepared by
University College Dublin

Authors:

Cara Augustenborg, Patricia Lentz, Leonhard Lades, Margaret Samahita and Lucie Martin

ENVIRONMENTAL PROTECTION AGENCY
An Ghníomhaireacht um Chaomhnú Comhshaoil
PO Box 3000, Johnstown Castle, Co. Wexford, Ireland

Telephone: +353 53 916 0600 Fax: +353 53 916 0699
Email: info@epa.ie Website: www.epa.ie

ACKNOWLEDGEMENTS

This report is published as part of the EPA Research Programme 2021–2030. The EPA Research Programme is a Government of Ireland initiative funded by the Department of Climate, Energy and the Environment. It is administered by the Environmental Protection Agency, which has the statutory function of co-ordinating and promoting environmental research.

The authors would like to acknowledge the members of the project steering committee, namely Desmond O’Mahony (EPA), Hannah Julienne (Sustainable Energy Authority of Ireland), Martin Bækgaard (Aarhus University), Micheál O’Dwyer (EPA), Michelle Corrigan (Department of Agriculture, Food and the Marine (DAFM)), Noeleen McDonald (DAFM), Shane Timmons (Economic and Social Research Institute) and Sandy McPhee (Department of Climate, Energy and the Environment). The authors would also like to acknowledge the support of the Research Project Manager on behalf of the EPA, namely Anne Mason. The project team also wishes to acknowledge the contributions of research assistants Isabelle Hardgrave, Glenn McNamara, Darragh Condon, Niamh Whelan and Mohamed Moheeb, along with the 65 stakeholders who informed portions of this research. Ethics approval was confirmed by University College Dublin’s Office of Research Ethics for the research described in section 2.2.2 on 7 September 2023 (reference LS-LR-23-208-Lades) and for the methodology presented in section 2.2.3 on 19 June 2023 (reference LS-LR-23-136-Augustenburg).

DISCLAIMER

Although every effort has been made to ensure the accuracy of the material contained in this publication, complete accuracy cannot be guaranteed. The Environmental Protection Agency, the authors and the steering committee members do not accept any responsibility whatsoever for loss or damage occasioned, or claimed to have been occasioned, in part or in full, as a consequence of any person acting, or refraining from acting, as a result of a matter contained in this publication. Any opinions, findings or recommendations expressed in this report are those of the authors and do not reflect a position or recommendation of the EPA. All or part of this publication may be reproduced without further permission, provided the source is acknowledged.

This report is based on research carried out/data from March 2023 to August 2025. More recent data may have become available since the research was completed.

The EPA Research Programme addresses the need for research in Ireland to inform policymakers and other stakeholders on a range of questions in relation to environmental protection. These reports are intended as contributions to the necessary debate on the protection of the environment.

EPA RESEARCH PROGRAMME 2021–2030

Published by the Environmental Protection Agency, Ireland

ISBN: 978-1-80009-384-3

April 2026

Price: Free

Online version

Project Partners

Dr Cara Augustenborg

School of Architecture, Planning and
Environmental Policy
University College Dublin
Belfield
Dublin 4
Email: cara.augustenborg@ucd.ie

Ms Patricia Lentz

School of Architecture, Planning and
Environmental Policy
University College Dublin
Belfield
Dublin 4

Professor Leonhard Lades

Economics
University of Stirling
Stirling
Email: l.k.lades@stir.ac.uk

Dr Margaret Samahita

School of Economics
Geary Institute
University College Dublin
Belfield
Dublin 4
Email: margaret.samahita@ucd.ie

Dr Lucie Martin

Behavioural Research Unit
Economic and Social Research Institute
Dublin 2
Email: Lucie.Martin@esri.ie

Contents

Acknowledgements	ii
Disclaimer	ii
Project Partners	iii
List of Figures and Tables	vii
Executive Summary	ix
1 Introduction	1
1.1 Background	1
1.2 Objectives	1
1.3 Research Approach	1
2 Assessment of Administrative Frictions in Ireland’s 2023 Climate Action Plan	3
2.1 Introduction	3
2.2 Methodology	3
2.3 Identifying Administrative Frictions in Climate Action: Case Studies from Ireland’s 2023 Climate Action Plan	5
2.4 Evaluating Stakeholder Insights on Administrative Burdens in Climate Policy	8
2.5 Conclusions	8
3 Quantitative Survey and Experiment	10
3.1 Introduction	10
3.2 Methodology	10
3.3 Results	11
3.4 Conclusions	12
4 Policy Implications	13
4.1 Reducing Administrative Frictions in Specific Climate Action Schemes	13
4.2 Applying Stakeholder Insights to Reduce Administrative Burdens in Climate Policy	13
4.3 Vulnerability to and Acceptability of Administrative Frictions and Their Effects	14
5 Conclusions	15
5.1 Limitations	15
5.2 Future Research	15

References		19
Appendix 1	Actions Identified in Ireland’s 2023 Climate Action Plan That May Contain Administrative Burdens	21
Appendix 2	List of Project Outputs	26
Appendix 3	Examples of Treatments in Experiment	27
A3.1	Low Sludge	27
A3.2	Medium Sludge	27
A3.3	High Sludge	29
Abbreviations		36

List of Figures and Tables

Figures

Figure 1.1.	ABICAP project overview: WP1–WP7	2
Figure 2.1.	Overview of the methodology used in the administrative friction assessment	5

Tables

Table 2.1.	Actions identified in Ireland’s 2023 Climate Action Plan that may have excessive administrative frictions	4
Table 2.2.	Notable observations on administrative frictions in relation to climate action in three schemes within Ireland’s 2023 Climate Action Plan	7
Table A1.1.	Actions identified in Ireland’s 2023 Climate Action Plan by sector	21

Executive Summary

Ireland's annual climate action plans establish a roadmap to achieving a reduction in national greenhouse gas emissions by 51% by 2030 and net-zero emissions by 2050. Effective climate policy instruments are necessary for Ireland to achieve these ambitious targets. One often overlooked barrier to successful policy implementation is the impact of administrative burdens or frictions on policy uptake and engagement. Academics consider policy implementation to be associated with administrative frictions or burdens if an individual's experience of policy implementation is perceived to be onerous. This perception could arise because of actions such as having to fill out complex application paperwork or having to follow unclear guidance, resulting in substantial waiting times for decisions. This EPA-funded project, that is, the Assessing Administrative Burdens as Barriers to Implementation of Ireland's Climate Action Plan (ABICAP) project, aimed to identify the presence of administrative frictions in the delivery of climate policies and reduce these frictions or burdens. The project used a mixed-methods approach, combining a living literature review, 65 stakeholder interviews, a nationally representative survey and a behavioural experiment, to assess and in turn reduce administrative frictions in delivering Ireland's climate action plans.

Notable insights were gathered across three administrative friction assessments, namely of Ireland's Afforestation Scheme 2023–2027, the 2024 Solar for Schools Programme and the 2023 Shared Island Sports Club EV Charging Scheme. In addition to scheme-specific recommendations, the assessments of these climate action schemes collectively resulted in three overarching findings: administrative frictions are often highest at the point of delivery, scheme design can be improved through cross-agency collaboration and administrative friction assessments offer a valuable means of evaluating climate policy.

Results from the survey assessing individual differences in vulnerability to and acceptability of administrative frictions revealed the types of administrative frictions most problematic to individuals;

the differences between public and private sector frictions; and the individuals who are the most vulnerable to and least accepting of these frictions. The most problematic types of bottlenecks were identified as websites with poor user navigation, unfriendly staff interactions and complex document language. Likewise, the survey revealed that participants perceived similar levels of vulnerability and acceptability between the public and private sectors. The results identified individual characteristics that predicted one's vulnerability to and acceptability of administrative barriers as well.

A quantitative experiment testing who is most influenced by administrative frictions revealed that increased levels of complexity and length in administrative documents, referred to as "sludge", significantly reduced participants' ability to correctly understand key information. Participants exposed to high-sludge conditions performed worse on comprehension tasks than those exposed to low-sludge conditions, demonstrating that administrative complexity can causally impair user performance. Crucially, the experiment identified that individuals with higher computer and administrative literacy levels were more resilient to these effects, while those experiencing tiredness were more negatively affected. These findings provide causal evidence that simplifying administrative processes can improve accessibility and outcomes, particularly for those with higher cognitive demands or lower digital resources.

With these insights, the project established the following recommendations for, and identified the possible policy implications of, tackling administrative roadblocks in climate action, including practical, scheme-specific recommendations for tackling the main friction points identified for three existing climate action schemes, as well as broader lessons for policymakers and researchers:

- The departments responsible for climate action schemes should embed internal "friction checks" into scheme design and delivery. For example, forestry licensing should include clearer timelines and communication protocols, solar grant schemes should streamline procurement rules,

and electric vehicle (EV) charging schemes should guarantee regular applicant updates.

- The schemes identified as priorities for future friction assessments include forestry licensing, retrofits and heat pump programmes, offshore wind consent and local authority EV charging. These areas were flagged as especially prone to delays, inconsistent requirements or excessive paperwork, and thus should be assessed early to prevent applicant drop-out.
- Researchers and policymakers should avoid using terms like “sludge” and “audit”, which stakeholders found off-putting, and instead describe initiatives as “service improvement projects”. This language, already successfully used in Ireland’s health sector, could improve collaboration and buy-in from civil servants.

The ABICAP project highlights the importance of administrative design in successful climate policy delivery. The project acknowledges limitations due to reliance on subjective interpretation, self-reported data and a UK-based sample for the experimental methodology. Still, the project offers a robust methodology for assessing friction and guiding future research. Priority areas include improving time-use data collection, enhancing institutional collaboration and expanding assessments to additional climate actions. Future studies should also explore the behavioural impacts of friction, aim to broaden typologies and test practical design interventions. This work provides a strong foundation for more inclusive, effective and user-friendly climate policy implementation in Ireland and beyond.

1 Introduction

1.1 Background

In 2021, under the Climate Action and Low Carbon Development (Amendment) Act 2021 (No. 32 of 2021) (Government of Ireland, 2021), the Government of Ireland established legally binding targets to reduce greenhouse gas emissions by 51% by 2030 and achieve net-zero emissions by 2050. Achieving these targets requires not only effective policies but also efficient implementation strategies. Administrative burdens or frictions are often overlooked in policy implementation due to the hidden nature of their costs (Moynihan *et al.*, 2015). While some administrative requirements are necessary, others may be unnecessarily onerous or inequitably distributed. This EPA-funded research project, that is, the Assessing Administrative Burdens as Barriers to Implementation of Ireland's Climate Action Plan (ABICAP) project, was designed to analyse whether these frictions are present in the delivery of Ireland's national climate action plans (NCAPs). The project aimed to identify specific administrative frictions that impact scheme participation or engagement by combining concepts from behavioural science and environmental policymaking. The ABICAP project employed an interdisciplinary approach to distinguish and reduce these frictions to ultimately support the implementation and delivery of effective climate policy in Ireland.

Administrative frictions can make it harder to find the relevant information (search costs); make it more difficult to assess the benefits and costs of a decision (evaluation costs); create frustration, stress, embarrassment and other negative emotions (psychological costs); and lead to waiting times and other delays (time costs) (Herd and Moynihan, 2019; Moynihan *et al.*, 2015; Shahab and Lades, 2024). Interest in administrative friction is growing worldwide as governments and organisations strive to understand how friction reduction initiatives can improve processes (OECD, 2024; OIRA, 2024; Sunstein, 2022). This is the first project to analyse environmental policy implementation by viewing it through the lens of administrative frictions.

1.2 Objectives

The ABICAP project had five specific objectives and associated work packages (WPs):

1. to analyse existing international evidence on key methods to identify and reduce unnecessary administrative burdens (WP2);
2. to determine which policies in Ireland's 2023 Climate Action Plan had prevalent and/or excessive administrative burdens (WP3);
3. to establish recommendations to help reduce administrative burdens within climate action policies or schemes (WP4);
4. to identify which segments of the population suffer the most from administrative frictions and to experimentally assess the effects of changes to administrative processes on behaviour (WP5);
5. to develop a simple framework to guide stakeholders in identifying administrative burdens on their own (WP6).

1.3 Research Approach

The ABICAP project employed a mixed-methods, interdisciplinary approach to identify and evaluate administrative frictions in the implementation of Ireland's 2023 Climate Action Plan. Drawing on concepts from behavioural science, public administration and environmental policy, the project employed both qualitative and quantitative methodologies. Across WP1–WP4, the project published a “living” literature review, created behavioural journey maps, completed 65 semi-structured stakeholder interviews, hosted two workshops and tested a “sludge audit” methodology, which was informed by the Government of New South Wales (NSW) Behavioural Insight Unit (New South Wales Behavioural Insights Unit, 2024) and earlier conceptual work (Shahab and Lades, 2024), to quantify and qualify administrative frictions. In WP5 and WP6, a nationally representative survey

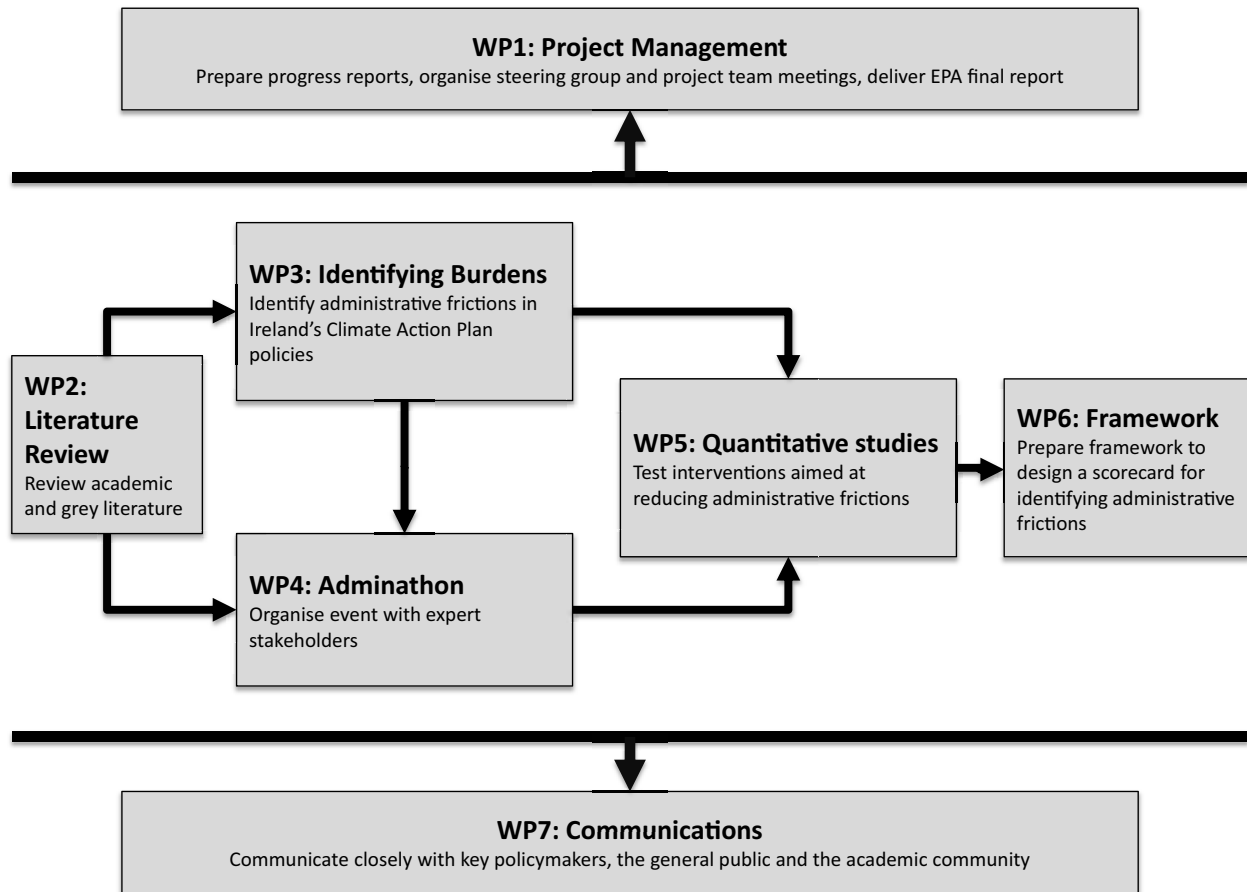


Figure 1.1. ABICAP project overview: WP1–WP7.

was conducted to measure individual differences in the vulnerability to and acceptability of administrative burdens and experimental tests were designed to assess the behavioural impacts resulting from modifications in administrative processes. Collectively,

this research contributed new methodological approaches to analysing administrative frictions and applied these to better understand the implementation barriers affecting environmental policies. Figure 1.1 gives an overview of the different WPs and their links.

2 Assessment of Administrative Frictions in Ireland's 2023 Climate Action Plan

2.1 Introduction

Ireland's NCAPs establish roadmaps of climate actions to achieve the national climate objective of reaching net-zero emissions by 2050 (Government of Ireland, 2022). With over 400 activities in its Annex of Actions, the 2023 Climate Action Plan includes actions from key environmental sectors, including electricity, transport, built environment, industry, agriculture and land use. While the Government of Ireland publishes NCAPs annually, due to the timing of this research, the project solely assessed actions included in the 2023 Climate Action Plan to identify if administrative burdens create unnecessary frictions in the system and could therefore widen the gap between climate aspirations and climate actions. While administrative requirements are often necessary for programme integrity, avoidance of environmental harm, accountability and transparency, the project focused on situations where administrative frictions are unnecessarily high and unequally distributed. Preceding this project, a few academics had examined how to identify and reduce administrative frictions, with literature on the importance of administrative burdens emerging from the fields of public administration (e.g. Herd and Moynihan, 2019) and behavioural public policy (e.g. Sunstein, 2021). Thus, the ABICAP project is one of the first projects to identify administrative frictions in climate action using qualitative research methodologies. This chapter presents the research objectives of the ABICAP project, that is, to identify policies in Ireland's 2023 Climate Action Plan that have predominant and preventable administrative burdens and provide recommendations for future burden reduction in the context of climate action and beyond.

2.2 Methodology

To achieve its research objectives, the project first determined which of the more than 400 actions in Ireland's 2023 Climate Action Plan could potentially have excessive administrative frictions (as described in section 2.2.1). Following initial screening, three schemes across three sectors were selected for more

detailed "sludge audits", a modified methodology (summarised in section 2.2.2) that was established by the NSW Behavioural Insights Unit to identify, quantify and eliminate friction in a user's journey, making services easier and more inclusive (New South Wales Behavioural Insights Unit, 2024). Section 2.2.3 presents the methods used to gather stakeholder insights on administrative burdens in climate policy.

2.2.1 *Screening Ireland's 2023 Climate Action Plan for potential administrative frictions*

Ireland's 2023 Climate Action Plan was first screened by a panel of 17 researchers to identify actions that may have potential administrative frictions. In this initial screening, 30 policies from the 2023 Climate Action Plan were identified as potentially containing administrative frictions (see Appendix 1).

An initial analysis of eight policies was then conducted, using existing information about the policies and evidence on administrative frictions in similar contexts, to help select three case studies (Table 2.1). We considered six criteria. The first criterion was potential impact. For example, increasing afforestation rates was rated "high" for potential impact given its scope for helping reduce Ireland's emissions. We also assessed the likely level of friction. For example, installing solar panels in schools was rated "high" for its level of friction based on newspaper reports of schools struggling with requirements (at that time) to apply for planning permission to install solar panels. Another criterion was whether policy implementation was delayed or facing issues (i.e. lagging behind), which could indicate that frictions are relevant policy barriers. For example, organic farming was rated as not lagging behind, given the high levels of (successful) applications to the organic farming scheme. We also considered feasibility for change, to ensure that our findings could meaningfully inform policy. For example, we estimated a low feasibility for change with regard to the offshore wind consent process,

Table 2.1. Actions identified in Ireland's 2023 Climate Action Plan that may have excessive administrative frictions

Action selected for in-depth audit	Criterion					
	Potential impact	Likely level of friction	Lagging behind?	Feasibility for change	Inequality reduction	Scalability of findings
LU/23/1: Increase afforestation rates ^a	High	High	Yes	Medium	Medium	High
AG/23/9: Support organic farming	Low	High	No	Medium	Medium	High
EL/23/8: Offshore wind consent process	High	High	Yes	Low	Medium	Medium
BE/23/34/D: Solar panels in schools ^a	Medium	High	Yes	High	High	High
BE/23/10: Deliver retrofits and heat pump installations	High	Medium	Yes	Low	High	High
BE/23/16: Increase registered providers	High	Medium	Yes	Low	Medium	High
TR/23/56: Local authority EV scheme	Medium	High	Yes	Medium	Medium	High
TR/23/55: EV sports clubs charge points ^a	Medium	High	Yes	High	High	High

^aActions related to policies selected for analysis.

given the complex legal requirements involved. Scope for inequality reduction was also considered. For example, we rated electric vehicle (EV) sports club charge points as “high” based on this criterion, as the Shared Island Sports Club EV Charging Scheme focused on Just Transition Fund areas (the Midlands) and these communities with fewer resources are most likely to benefit from easier access to this scheme. Finally, we rated each policy on scalability of findings. For example, an administrative friction case study of a grant-based scheme, such as the Solar for Schools Programme, is likely to provide insights applicable to other solar panel grants.

Based on these criteria, the team selected three policies from this analysis: (1) Ireland's Afforestation Scheme 2023–2027, (2) the Solar for Schools Programme and (3) the Shared Island Sports Club EV Charging Scheme. Sections 2.3.1–2.3.3 summarise the findings from each of these assessments; the full analysis of each scheme is linked to individual policy briefs published on publicpolicy.ie and is discussed further in the project outputs listed in Appendix 2.

2.2.2 Identifying administrative barriers to implementing specific climate action schemes

The application processes of three actions from the 2023 Climate Action Plan were selected for in-depth assessment of administrative frictions. The project applied a “sludge audit” methodology developed by the NSW Behavioural Insights Unit (Figure 2.1). The three climate actions were assessed using behavioural

journey mapping to illustrate the usual steps involved in participating in the application process. Then, the level of administrative friction was quantified at each step of the behavioural journey using the NSW Behavioural Insights Unit's sludge scales, applied as part of their Sludge Toolkit (New South Wales Behavioural Insights Unit, 2024). Using the sludge scales, each step received a rating from 1 (very easy) to 5 (very difficult). Elements of a user's experience in a process (e.g. language, content, design, navigation) were assessed and ratings were recommended based on certain criteria. The administrative frictions were then categorised at each step into cost categories, including time costs, search costs, evaluation costs, implementation costs and psychological costs, from a typology developed by Shahab and Lades (2024). Finally, semi-structured interviews were conducted with key stakeholders to assess the level of friction at each individual step of the process. This methodological approach allows each component to interconnect and inform each other (Figure 2.1). The journey maps were informed by the semi-structured interviews, and vice versa, while the interview findings contributed to the quantification of the extent of each friction. This methodology made it possible to assess each step in the application process where administrative frictions may be present and provide recommendations to reduce these frictions.

2.2.3 Gathering stakeholder insights on administrative burdens in climate policy

To inform recommendations on future administrative burden reduction in the context of climate action,

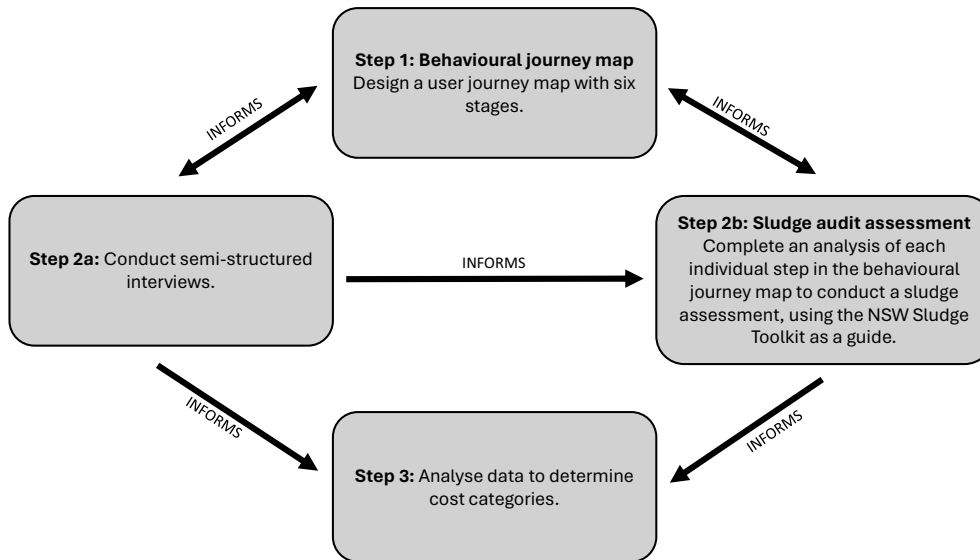


Figure 2.1. Overview of the methodology used in the administrative friction assessment.

a collaborative online workshop with Ireland's Climate Change Advisory Council was arranged in February 2025, in addition to interviews with 34 key stakeholders from government ($n=8$), state agencies ($n=2$), non-governmental organisations ($n=14$), academia ($n=6$), media ($n=2$) and industry ($n=2$). In total, the project incorporated the views of 57 stakeholders into the analysis.

2.3 Identifying Administrative Frictions in Climate Action: Case Studies from Ireland's 2023 Climate Action Plan

This section presents the assessment of three climate action schemes in Ireland, identifying the administrative frictions hindering scheme participation and implementation. The research discovered the specific bottlenecks present in the application processes of the Afforestation Scheme 2023–2027, the Solar for Schools Programme and the Shared Island Sports Club EV Charging Scheme. The results of the analysis produced actionable recommendations for improving scheme uptake and implementation, discussed in section 4.1 of this report.

2.3.1 Administrative barriers to delivering Ireland's Afforestation Scheme 2023–2027

Ireland's Afforestation Scheme 2023–2027 provides substantial grants to landowners and farmers to plant

trees (DAFM, 2023). Despite generous grant aid, participation in the scheme remains below national targets and the number of trees being planted annually has been in decline (DAFM, 2024). One potential barrier to grant uptake is the administrative friction present in the scheme. This may cause policy implementation to be considered onerous and costly. An assessment of administrative frictions conducted as part of this project determined that unpredictable timelines in the application process created additional indirect costs for both landowners and registered foresters who applied for the scheme. Due to the uncertainty of grant application outcomes, applicants struggled with deciding whether to apply or continue with the process.

The assessment identified that the highest administrative frictions in the afforestation scheme occurred when Ireland's Department of Agriculture, Food and the Marine (DAFM) issued a "Further Information Required" letter to the registered forester and landowner, requesting that applicants submit additional information about their proposed planting site within an 8-week period, resulting in additional indirect costs and burdens to the landowner arising from additional surveys, remedial actions and/or environmental assessments. The timing and specific requests of this letter were difficult to predict, creating an uncertainty that caused some landowners to experience stress and anxiety. Additional administrative frictions identified in this assessment included the unpredictability of

application timelines and the inconsistency of decision-making at the regional forestry inspectorate level, according to interview stakeholders. The assessment ultimately helped to identify four recommendations for addressing the frictions identified in the scheme; these are discussed in section 4.1 of this report. A full description of the methodology, results and policy recommendations from this assessment are also available at publicpolicy.ie (see Lentz *et al.*, 2024).

2.3.2 *Administrative barriers to delivering Ireland's 2024 Solar for Schools Programme*

The Government of Ireland established a national target for the installation of 8 GW of solar photovoltaic (PV) panels nationally by 2030 in its 2023 Climate Action Plan. Under this target, the Department of Education launched the Solar for Schools Programme in November 2023. This programme offers all eligible primary and secondary schools in Ireland the opportunity to receive funding to install rooftop solar PV panels. While this allows schools to reduce electricity costs, barriers to participation can emerge through frictions within the application process, making a school's experience onerous. An assessment of the application process for Ireland's Solar for Schools Programme was conducted to identify administrative frictions that could have an impact on programme participation and uptake. While the assessment of the process revealed a low level of administrative burdens, the most substantial barriers to programme participation arose in the contractor tender selection process and the restriction of a 6 kW limit (approximately 16 panels) of government-funded solar panels. The project identified administrative frictions across 4 out of the 30 steps of the application process, including checking the contractor list, collecting three contractor quotes, preparing application documentation and panel installation. As school principals may lack the technical expertise and operational capacity to apply for the programme, the removal of excessive administrative barriers is crucial for supporting scheme uptake and maintaining engagement with schools. Additional frictions identified in this assessment included confusion over whether quotes should be VAT-inclusive or VAT-exclusive in the application forms and the overall frustration with the 6 kW limit of solar PV panels for each school. To address these frictions, three recommendations

are proposed in section 4.1. A full description of the methodology, results and policy recommendations from this assessment are available at publicpolicy.ie (see Lentz *et al.*, 2025a).

2.3.3 *Administrative barriers to delivering the 2023 Shared Island Sports Club EV Charging Scheme*

In Ireland's 2023 Climate Action Plan, the Government of Ireland instituted targets to enable a low-carbon transition for the country, including a target to expand the adoption of EVs. As part of this target, the Department of Transport's Zero Emission Vehicles Ireland initiative introduced the Shared Island Sports Club EV Charging Scheme in February 2023, allowing sports clubs to apply for funding to install EV chargers in both Ireland and Northern Ireland. However, as of December 2024, nearly 2 years into the application process, the scheme had stalled and no EV charging points had been installed. In spite of this delay, an assessment of the first half of the application process was completed to determine if administrative frictions were present in the scheme and to provide recommendations for reducing these frictions. Excessive waiting times, inadequate communication and uncertainty about the scheme's progress were the most significant administrative barriers identified in the scheme.

Friction levels were low in the first two stages of the scheme due to the implementation of strong outreach activities and the clear application requirements for sports clubs. However, once the applications were successfully submitted, applicant sports clubs faced extensive delays in the third stage due to issues with scheme administration. These delays created frictions for already resource-constrained groups, as many sports clubs operate through volunteer staff. This assessment also identified uncertainty as a principal source of friction for the sports clubs participating in the scheme, as the remaining steps within the application process were unclear at the time of this assessment. Additional frictions identified in this scheme included a lack of proactive communication by scheme administration and the indirect costs incurred by additional information requests. Three recommendations are proposed in section 4.1 for addressing the frictions identified in the scheme. A full description of the methodology, results and policy

recommendations from this assessment are also available at publicpolicy.ie (see Lentz *et al.*, 2025b).

2.3.4 *Cross-sectoral insights on administrative barriers within national climate action plans*

Across all three climate action schemes analysed in this research, the highest levels of friction occurred in the middle to late stages of scheme implementation, impacting engagement and overall progress. Table 2.2 summarises the research findings and notable observations from the three climate action schemes, including the stage with the highest level of administrative friction and the stakeholder group most affected by friction. In Ireland's Afforestation Scheme 2023–2027, small, private landowners dealt with excessive delays in receiving licence decisions, inconsistency in inspectorate decision-making and general uncertainty. In the 2024 Solar for Schools Programme, school principals faced only low friction levels across the application process due to effective scheme outreach and organisational collaboration. Analysis of the Shared Island Sports Club EV Charging Scheme demonstrated how often volunteer-led sports clubs contended with prolonged and uncertain timelines for charger installation and delivery. The collective analysis of these three schemes yielded the following insights.

Administrative friction levels are often highest at the point of delivery

In the Afforestation Scheme 2023–2027, landowners waiting for their licence decision to be published incurred substantial indirect costs, including

psychological costs and evaluation costs. Likewise, some school principals in the 2024 Solar for Schools Programme faced issues sourcing contractor quotes in the early stages of the scheme. Finally, in the 2023 Shared Island Sports Club EV Charging Scheme, sports clubs struggled with prolonged uncertainty and poor communication after their applications were submitted. Even after technical site visits had been completed, sports clubs were uncertain of the status of their applications and their future in the scheme. In all three schemes, administrative frictions at the various points of delivery appeared to threaten applicant retention and uptake, due to applicants facing excessive indirect costs.

Scheme design could be improved through cross-agency collaboration

As demonstrated in two of the three climate action schemes, cross-agency partnerships can be a powerful technique to reduce the administrative burdens on applicants. In the Solar for Schools Programme, the Department of Education collaborated with the Sustainable Energy Authority of Ireland (SEAI), allowing applicants to engage with the SEAI for technical expertise and guidance. In the 2023 Shared Island Sports Club EV Charging Scheme, the application process benefited from an initial collaboration between the scheme administration and the National Governing Bodies of Sport (NGBS) to conduct screening for early interest in the scheme. This removed the search and evaluation costs for sports clubs, as they received an invitation for scheme participation directly from the NGBS, an organisation that they were already familiar with. This evidence demonstrates that, when delivering funding or services to the public, policymakers can benefit from strategic

Table 2.2. Notable observations on administrative frictions in relation to climate action in three schemes within Ireland's 2023 Climate Action Plan

Scheme	2023 Climate Action Plan action number	Stage with highest level of friction	Who is affected most?	Key observations
Afforestation Scheme 2023–2027	LU/23/1	Licensing decision (middle to late stages)	Small private landowners	Delays of > 1 year; inconsistent requests among forestry inspectors
Solar for Schools Programme	BE/23/34/D	Procurement and project execution (mid-stage)	School principals, administrative staff	Principals often lacked time and procurement expertise; rigid system limits scale of impact
Shared Island Sports Club EV Charging Scheme	TR/23/55	Application decision and installation (late stage)	Volunteer-led sports clubs	Delays of > 1 year; unclear next steps; late-stage solicitor requests demotivate applicants

partnerships between government departments and expert agencies to alleviate existing gaps in capacity and reduce administrative burdens on applicants.

Administrative friction assessments offer a valuable means of evaluating climate policy

While such assessments have been conducted in other policy areas, such as human resources (OECD, 2024), health (Rockwell *et al.*, 2023) and welfare (Herd *et al.*, 2013), this project conducted some of the first assessments to identify administrative frictions as barriers to *climate action*. This methodology identified the individual user steps causing the most friction across the three climate action schemes, gauging the level of indirect costs incurred by applicants.

2.4 Evaluating Stakeholder Insights on Administrative Burdens in Climate Policy

To aid future administrative burden reduction efforts and to support the implementation of NCAPs, the project conducted a 1-hour online workshop with the Climate Change Advisory Council in February 2025 and 34 semi-structured interviews with environmental policy stakeholders in Ireland. In the workshop, knowledge was reciprocally exchanged, with members of the council learning about administrative frictions in the context of climate action and the project team gaining insights into conducting research and communicating administrative burdens with policymakers. During the event, the project team presented the research outputs and initiated a discussion on administrative frictions in Irish climate policy implementation. In addition to the workshop, as part of a larger study on Irish environmental policy implementation, 34 stakeholder interviews were conducted from June to September 2023. Data were gathered from responses to open-ended research questions, including “Do you think anybody faces administrative or bureaucratic processes that are problematic in your environmental area?”

From the responses to this question and the workshop discussion, the project identified five themes presenting barriers to climate action in Ireland:

- 1. Excessive paperwork and procedural rigidities.** Stakeholders emphasised the importance of acknowledging the excessive paperwork and

procedural rigidities as barriers to climate policy implementation in Ireland. These administrative inefficiencies can especially hinder engagement for applicants with limited digital literacy or capacity.

- 2. Lack of an integrated approach.** Due to government structure, stakeholders acknowledged that departments are fragmented and complex, causing administrative burdens to emerge in such siloed systems.
- 3. Poor communication and lack of transparency.** Stakeholders identified poor communication and transparency as sources of administrative friction and frustration within climate action schemes. It was argued that more departmental collaboration, such as that observed in the Solar for Schools Programme (Lentz *et al.*, 2025a), is necessary for improving transparency and communication with applicants and the public.
- 4. Delays in planning systems.** Stakeholders also recognised that delays within the planning, permitting and licensing systems cause bottlenecks within climate action.
- 5. Insufficient staffing capacity.** Deficient staffing capacity was identified as a primary administrative barrier to climate action. According to stakeholders, as the number of climate action schemes increases, the support for staffing or training capacity is perceived to remain stagnant.

Based on these stakeholder insights, the project proposed three recommendations for future work on administrative burden reduction in climate policy, presented in section 4.2. The full methodology, results and recommendations from this research are also available in Augustenborg *et al.* (in review).

2.5 Conclusions

The ABICAP project applied a “sludge audit” methodology to assess administrative frictions within Ireland’s 2023 Climate Action Plan. This methodology allowed the project to identify administrative frictions in the application processes of Ireland’s Afforestation Scheme 2023–2027, the 2024 Solar for Schools Programme and the 2023 Shared Island Sports Club EV Charging Scheme. These frictions often resulted in additional indirect costs for applicants, including

time costs, learning costs, compliance costs and psychological costs. As part of this methodology, the project completed behavioural journey maps for each of the three schemes to identify the steps in the application processes and diagnose where administrative burdens accumulate. These frictions can act as invisible bottlenecks to climate policy implementation, particularly for resource-constrained groups and volunteer-led organisations. The results reflect a need to implement administrative friction assessments earlier in the policymaking process to

reduce burdensome frictions, rather than examining them at the end of a scheme or process. Additionally, the project gathered insights from 57 stakeholders to identify and reduce administrative burdens in climate policy implementation and to inform future efforts. These insights emphasised excessive paperwork, fragmented government structures, poor communication and transparency, delays in planning and permitting, and insufficient staffing capacity as key barriers hindering effective climate action.

3 Quantitative Survey and Experiment

3.1 Introduction

In the WP5 of the ABICAP project, a nationally representative survey was completed to assess individual differences in the vulnerability to and acceptability of different types of administrative frictions. Despite increasing interest in administrative frictions, or sludge, a comprehensive understanding of what impacts an individual's vulnerability to, and acceptability of, different types of administrative frictions cannot be gained from existing literature. Academics have argued that some sections of the population are more affected by friction than others when accessing government benefits (Christensen *et al.*, 2020; Halling *et al.*, 2023; Heinrich, 2016; Herd *et al.*, 2023; Martin, 2024; Sunstein, 2021), but no systematic evidence is available about what types of frictions are particularly problematic for specific segments of the population. Likewise, there is a growing body of literature on the acceptability of nudges, defined as “any aspect of the choice architecture that alters people's behaviour in a predictable way without forbidding any options or significantly changing their economic incentive” (Sunstein, 2016). However, before this survey, there had not been any evidence for the acceptability of different types of sludge.

The nationally representative survey provided correlational findings. This was complemented through an online experiment in which the level of sludge was experimentally manipulated to identify the causal effects of sludge on behaviour. The behaviour in question was the correct identification of information essential for the successful application for environmental community benefit grants. To our knowledge, the ABICAP project is one of the first projects to test for the causal effects of sludge on behaviour.

3.2 Methodology

3.2.1 *Surveying sludge vulnerability and acceptability*

The main objective of the quantitative survey was to identify the segments of the population most

vulnerable to and least accepting of administrative frictions. To achieve this, the project relied on a nationally representative survey from Ireland, involving 1591 participants, that assessed 20 experimentally differing administrative burden scenarios.

Participants were presented with 10 different types of administrative processes where they needed to complete a task, in either a public or a private sector context. These 10 tasks were taken from the list of sludge types presented in *The New South Wales Government Sludge Audit Method Guide* (New South Wales Behavioural Insights Unit, 2024). We then simplified the list and reduced it to 10 types of sludge, to avoid survey fatigue, and included the types of sludge we anticipated would vary in how people view them. The survey asked participants to think of “the task” as something that they would like to achieve (e.g. obtaining a service, seeking information or other benefits) without it being an absolute necessity. The task was not further specified, as tasks differ regarding their importance (e.g. the paperwork to redeem a €20 expense vs the paperwork to obtain a work visa). The participants were randomly assigned to one of two conditions: for half the participants, administrative processes were described as deriving from a government agency, while for the other half, the administrative processes were described as deriving from a private company. This private–public variation was introduced to explore whether perceived legitimacy and trust in institutions matter for burden tolerance. For each administrative process, the survey asked participants four questions that sought to measure how vulnerable they were to each process and two questions that sought to determine their acceptability of each process.

The project recruited survey participants through the panel provider Dynata in October 2024, aiming to obtain a nationally representative sample of Ireland in terms of age, gender and geographical spread. Participants were paid baseline compensation through the panel provider. Additional summary statistics of the participant sample are presented in the corresponding academic paper (Lades *et al.*, 2025). As these are data from a cross-sectional survey, the information is self-reported, the answers are hypothetical and we can

make only limited conclusions regarding the causal relationship between the variables. To overcome these limitations, real-effort task experiments can be used.

3.2.2 *Experiment: who is most influenced by administrative frictions?*

To overcome the limitations of the survey (i.e. hypothetical answers, self-reported information, correlational data), an experiment tested the effects of modifications in administrative processes on real human behaviour. This online experiment was conducted with a sample of approximately 1000 participants who were representative across age, gender and ethnicity. The experiment used a within-subject design in which all participants evaluated and answered questions about three hypothetical environmental grant schemes, each accompanied by a different level of administrative burden: low, medium or high. The treatment levels varied in both the volume and complexity of the information provided. Examples are provided in Appendix 3. Each participant was shown all three levels of administrative burden, the order of which was randomised across participants. In addition, participants were randomly assigned to one of two between-subject incentive conditions: a high reward (£200 lottery prize) or a low reward (£5 lottery prize). In both conditions, participants earned one entry into the lottery for each correct answer they provided to the comprehension questions about the grants. These questions were optional but incentivised, and their order was randomised within each section.

After the experimental tasks, participants completed a survey measuring a set of relevant variables, including administrative and computer literacy, self-reported tendency to procrastinate, conscientiousness, mental health, current levels of tiredness and busyness, and concern about climate change. Standard demographic variables were also collected, such as age, gender, education level, marital status, number of children and household income.

3.3 Results

3.3.1 *Survey: vulnerability to and acceptability of different types of administrative friction*

The results of the survey study revealed the most problematic types of administrative frictions,

comparisons between public and private sector frictions, and the individuals who are the most vulnerable to and least accepting of these frictions. The study ultimately identified the most problematic types of administrative frictions as websites with difficult user navigation, unfriendly employee interactions and documentation containing complex or technical language. These kinds of administrative burdens cause high levels of vulnerability and result in low levels of acceptability.

The results of the survey revealed that frictions involving implementation costs, such as long waiting times or rigid meeting times, were perceived as less problematic than other types of administrative burdens, with participants reporting lower levels of vulnerability in these scenarios than in other scenarios. The quantitative survey also measured the vulnerability to and acceptability of administrative frictions in processes from the public and private sectors, finding that participants perceived similar levels of vulnerability and acceptability in these sectors. This suggests that the nature of the friction is more important than its organisational context.

Finally, the study identified individual characteristics predicting vulnerability to and acceptability of administrative processes, including age, education level, location, income, mental health, administrative literacy and cognitive resources. The results revealed that individuals reporting poor mental health are pointedly more vulnerable to and less accepting of administrative frictions, while mental energy scarcity was associated with lower levels of acceptability. Self-assessments on tendency to procrastinate, a lack of time and insufficient mental energy exposed links to increased levels of vulnerability. In conclusion, other characteristics showed different levels of vulnerability to and acceptability of administrative frictions, resulting in key insights into the predictability of the impact of friction.

The findings from this survey offer critical insights into the nature and consequences of administrative frictions, highlighting which types of burdens are most problematic and who is most affected. The survey identified the most challenging forms of friction as difficult website navigation, unfriendly employee interactions and overly technical or complex documentation. These types of burdens were found to generate the highest levels of vulnerability and the lowest levels of acceptability among participants.

Importantly, these results held across both public and private sector interactions, indicating that the specific characteristics of the frictions, rather than the sector in which they occur, are the key determinants of impact. The survey also illuminated how individual differences, particularly poor mental health, few administrative or cognitive resources and time-related constraints, increase levels of vulnerability to these frictions, suggesting the need for targeted strategies to reduce burdens among the most affected groups.

3.3.2 *Experimental evidence on the behavioural impact of administrative process modifications*

The results of the experiment indicate that increasing levels of administrative frictions (referred to as “sludge”), as captured by the language complexity and length of documents, lead to participants having a lower level of comprehension of the information contained in the documents. In low-sludge conditions, participants answered, on average, 3.6 out of 4 questions correctly; in medium-sludge conditions, this number dropped to 3.3; and, in high-sludge conditions, this number dropped further, to only 2.75.

The experiment also explored individual characteristics that enhance participants' comprehension, finding the strongest positive correlation with computer literacy (measured as the ability to find and evaluate information online, navigate online portals and troubleshoot when help is needed) and the strongest negative correlation with current level of tiredness. Both computer literacy and current tiredness levels strongly interact with the effect of the sludge: having a high level of computer literacy mitigates the negative effect of high-sludge conditions, while current level of tiredness further exacerbates it. Additionally, scoring high on administrative literacy (i.e. the ability to understand official documents, keeping informed on and understanding regulations and contract details) also mitigates the effect of the high-sludge conditions.

The experimental component of the study further demonstrated how sludge affects the ability of individuals to search for and understand complex information. As the complexity and amount of information increased, participants' willingness or ability to complete the task declined significantly, with those in high-sludge conditions answering fewer

comprehension questions correctly. These results are consistent with those reported by Baekgaard *et al.* (2025), who found that the use of bureaucratic language can exacerbate learning, compliance and psychological costs. Individual differences again played a critical role: high computer and administrative literacy levels helped moderate the negative effects of sludge, while current tiredness made the effects of sludge worse. Collectively, the results point to practical opportunities for reducing administrative friction by simplifying language, improving interface design and ensuring supportive, human-centred service delivery, particularly when programmes are targeted at vulnerable populations.

3.4 Conclusions

This survey has advanced the current understanding of administrative frictions by providing the first nationally representative survey from Ireland on how different types of administrative burdens are perceived in terms of vulnerability and acceptability. The survey results confirm that administrative frictions are not experienced equally, with certain types of frictions often imposing greater burdens and causing higher perceived levels of vulnerability and lower levels of acceptability. The study also revealed that individual characteristics, like mental health and administrative literacy, are key predictors of the level of vulnerability to and acceptability of different types of administrative frictions. Policymakers and administrative process administrators can use these insights to reduce friction and better support equity for service accessibility.

To complement the survey and address its limitations, an experimental study provided causal evidence on how administrative complexity (or “sludge”) affects the ability of individuals to comprehend essential information. The findings show that higher levels of sludge significantly reduce comprehension, particularly for individuals experiencing tiredness or with lower digital and administrative literacy levels. These results suggest that simplifying language, improving user navigation and reducing unnecessary complexity can directly improve user outcomes, especially for more vulnerable populations. Together, the survey and experiment contribute to a more evidence-based understanding of how administrative burdens affect behaviour and equity and offer actionable pathways to reduce unnecessary friction.

4 Policy Implications

The recommendations below are directed at different types of actors, including government departments and agencies responsible for delivering climate action schemes, evaluation units within public administration bodies and the research community. To increase clarity and usability, each recommendation specifies the relevant actor(s) to which it applies.

4.1 Reducing Administrative Frictions in Specific Climate Action Schemes

The project has led to the production of three policy briefs examining climate action schemes, namely the Afforestation Scheme 2023–2027, the 2024 Solar for Schools Programme and the 2023 Shared Island Sports Club EV Charging Scheme, where administrative frictions were identified as key barriers to participation, and to the proposal of recommendations for relevant departments and agencies aimed at reducing these frictions.

- **Afforestation Scheme 2023–2027 (DAFM).** In the policy brief *Reducing Administrative Frictions in Ireland's Afforestation Scheme*, the project team recommended restructuring information requirements, establishing clear timelines, improving communication and completing similar assessments in other licensing schemes to reduce administrative friction and facilitate afforestation (Lentz *et al.*, 2024).
- **Solar for Schools Programme (Department of Education and SEAI).** The Solar for Schools brief *Improving Engagement with Ireland's Solar Schools Scheme by Reducing Administrative Frictions* recommended restructuring the tender process, simplifying the application requirements, removing restrictions on solar panel expansion, encouraging schools to maximise educational opportunities and applying this model to other schemes to address their administrative frictions (Lentz *et al.*, 2025a).
- **Shared Island Sports Club EV Charging Scheme (Department of Transport Zero Emission Vehicles Ireland).** In the policy brief *Administrative Frictions in Ireland's Shared Island*

Sports Club EV Charging Scheme, the project team recommended improving communication through monthly correspondence to sports clubs, introducing clear timelines and providing information for the remaining phases of the scheme to address the friction points (Lentz *et al.*, 2025b).

4.2 Applying Stakeholder Insights to Reduce Administrative Burdens in Climate Policy

In a policy brief on stakeholder insights on administrative frictions (Augustenborg *et al.*, in review), the following three key recommendations were presented based on consultation with 57 stakeholders, as described in section 2.4:

1. **Do not take willingness to collaborate for granted (government departments).** Willingness to collaborate should not be taken for granted. Efforts to engage stakeholders in projects assessing administrative burdens can be perceived as a criticism, rather than as an action to improve procedures in achieving shared goals in climate policy. Thus, it is important to consider how to incentivise stakeholders to engage with friction assessments.
2. **Encourage internal (rather than external) assessments of administrative burdens (government departments and evaluation units).** Assessments of administrative burdens are better conducted internally, rather than externally. This is due to the challenges associated with gaining access to protected data in the assessment process, such as application retention rates across climate action schemes. The Organisation for Economic Co-operation and Development is currently compiling a list of case studies conducting similar assessments, including those being conducted by the Dutch Government and the NSW Behavioural Insights Unit.
3. **Use appropriate terminology (researchers and advisors).** An overwhelming point of discussion among stakeholders was the use of

appropriate terminology when communicating with policymakers and civil servants about administrative burdens. Future work on administrative burden reduction should avoid using terms like “sludge” or “audit”, as they can be perceived as accusatory or critical of the policy or scheme administrators. Existing research, through Ireland's Department of Health, which aimed to improve administrative processes, discovered that interventions described as “service improvement projects” led to positive uptake among public servants (Department of Health, 2024).

These recommendations aim to support future work on identifying and minimising administrative frictions in climate action policy for relevant departments, researchers and advisors.

4.3 Vulnerability to and Acceptability of Administrative Frictions and Their Effects

The results of the quantitative survey and experiment underscore the critical importance of reducing administrative frictions, particularly those related to poor website navigation, unfriendly personnel interactions and overly complex paperwork. These types of frictions significantly increase levels of user vulnerability and reduce levels of acceptability, regardless of whether they occur in public or private sector settings. The experimental study further demonstrated that, as the complexity and length of administrative documents increased, the ability of participants to understand essential information markedly declined. This effect was particularly pronounced among individuals with lower levels of computer or administrative literacy, or those experiencing fatigue, for example elderly people with low digital literacy levels, time-poor families with young children or migrants facing language barriers. Highlighting these illustrative personas makes visible how poorly designed administrative processes can disadvantage specific groups. From a just transition

perspective, this suggests that, without targeted efforts to reduce administrative burdens, reforms risk reinforcing inequalities by placing the heaviest burdens on those least equipped to manage them.

Policy design should therefore prioritise the removal of content-specific frictions over organisational context, with careful attention being paid to individual characteristics that influence vulnerability. To achieve this, the project proposed the following recommendations for relevant policy actors, evaluation units and researchers:

- proactively remove administrative frictions by integrating friction assessments into the scheme design process (government departments and agencies);
- design adaptive pathways for the segments of the population most vulnerable to friction, including simplified processes and opportunities to interact directly with a human representative rather than automated systems (evaluation units);
- guarantee that websites and documentation are clear and accessible by minimising technical jargon and improving navigability (e.g. <https://www.gov.uk/> has a clean, user-centric design, simple content and mobile-friendly interface) (government departments and agencies);
- address the most problematic friction types for immediate reform, including poor website design, difficult personnel interactions and documentation complexity (researchers).

Together, the survey and experimental findings reveal that effective policy must be adaptive and responsive to administrative bottlenecks. Simplifying documentation and designing user-centred, cognitively accessible processes are essential strategies for ensuring fair and equitable access. By addressing the most impactful administrative frictions, policymakers can improve both the inclusivity and the effectiveness of administrative systems across public and private domains.

5 Conclusions

The findings of the project demonstrate the critical role that strategic administrative design plays in successful climate action policy. Specific stages in the delivery of three climate action schemes were identified where administrative frictions could deter participation or cause delays. In all three schemes, frictions were found to often congregate at key implementation and decision-making stages, despite the schemes differing in context and affecting different participatory groups. Insights gathered from 57 stakeholders provided useful guidance to encourage and conduct future administrative burden reduction efforts. The findings of this project emphasise the value of behavioural and user-oriented evaluations as pertaining to climate policy. A reduction in administrative frictions in climate policy can not only improve engagement and participation, but also improve equity and the overall impact of Ireland's national climate policy agenda. Appendix 2 lists the final deliverables and publications of the ABICAP project.

The survey and experimental components of the project further reinforced these conclusions by showing how administrative burdens are not experienced equally across the population, and how they can directly impair comprehension and participation. The nationally representative survey from Ireland revealed which types of administrative frictions are most problematic and who is most vulnerable to them, with mental health, administrative literacy and time scarcity emerging as key predictors. Complementing this, the UK-based experiment provided causal evidence that document complexity significantly reduces comprehension, particularly among individuals with lower computer and administrative literacy levels or higher levels of fatigue. Together, these findings highlight the need for an inclusive, evidence-based design of administrative processes to ensure that climate policy delivery is accessible, effective and equitable. This multi-method approach, combining stakeholder interviews, large-scale survey data and behavioural experimentation, demonstrates a robust model for identifying, understanding and mitigating administrative burdens across public policy domains.

5.1 Limitations

While the ABICAP project provided key insights into identifying and addressing administrative frictions in climate action schemes, the analysis used an administrative friction assessment methodology that relied on both objective and subjective interpretation. Thus, the assessment results inevitably reflect researcher judgement, and it is therefore not possible to ensure absolute accuracy using this methodology. In addition, the quantitative survey study measuring vulnerability to and acceptability of administrative frictions used a cross-sectional data set, enabling only limited claims about causality. Likewise, the survey study utilised self-reported data, which may be subject to the individual biases of participants. Finally, the quantitative experiment was conducted with a UK-based nationally representative sample, as it was not possible to recruit a sufficiently large and nationally representative Irish sample within the project's time frame and budget. While the UK and Ireland share many administrative and cultural similarities, caution should be taken when generalising the UK experimental findings directly to the Irish population.

5.2 Future Research

The ABICAP project has used a mixed-methods approach to identify and assess administrative burdens in Ireland's 2023 Climate Action Plan. However, further research in several areas could expand this understanding. In the assessment of the three climate action schemes, future areas for research were identified in each of the sectors evaluated, as follows:

- **Afforestation Scheme 2023–2027.** Future research on administrative burdens in afforestation schemes should prioritise the collection of definitive time-use data for each stage of the application process. The absence of such data in the current study limited the capacity to perform comprehensive, time-based analyses of procedural burdens. Future studies should aim to enhance quantification of the individual steps in the application process by holistically

assessing their duration and complexity, adding to the empirical robustness of friction assessments. Moreover, difficulties accessing data on application retention and the decision-making trends among forestry inspectors prevented a more objective evaluation. As a result, the results presented in section 2.3.1 relied heavily on stakeholder interviews and are therefore subject to interpretative bias. Future assessments would benefit from greater collaboration with departmental stakeholders, particularly those involved in the operational management and inspection of afforestation schemes and the application process. Such engagement would provide critical insights into institutional bottlenecks, sources of delay and the discretionary space within implementation practices. Additionally, research should be expanded to include other administrative components of forestry licensing schemes, such as the application process for thinning and permissions for forestry road construction and related afforestation procedures. A more holistic analysis of the forestry administration landscape would facilitate a fuller understanding of the cumulative burdens experienced by applicants and the capacity challenges faced by implementing agencies.

- **Solar for Schools Programme.** Future research supporting the installation of solar panels on schools should re-evaluate this scheme in light of the changes introduced during Phase II, launched in October 2024. Changes to the procedural requirements, such as an increase in the number of contractor quotes required from three to five, warrant a renewed assessment, to determine the impact of these changes on administrative complexity and applicant experience. A longitudinal approach may be useful in assessing how procedural reforms influence uptake, perceptions of burden and overall scheme effectiveness. Similar to other sectors examined in this research, future research should include the collection of key data, such as application retention rates, the volume and nature of applicant queries, and estimated time expenditure at each stage of the process. The timeliness of relevant departmental responses to applicant queries should also be examined to better capture the associated time costs of each step. These

additions would enable a more granular analysis of the procedural demands placed on schools and enhance the evidence base for streamlining future iterations of the programme.

- **Shared Island Sports Club EV Charging Scheme.** Future studies should prioritise the collection of data on application retention in the Shared Island Sports Club EV Charging Scheme, similar to the previous two climate action schemes, which would provide valuable insights into applicant attrition and the procedural barriers potentially contributing to disengagement. Stakeholder interviews identified considerable uncertainty regarding both the future of the application process and the feasibility of installation timelines. Additionally, future research should incorporate data on departmental responsiveness and decision-making timelines to support a more holistic evaluation of the application process. To enhance the validity and policy relevance of future analyses, researchers should collaborate directly with departmental stakeholders involved in scheme design and implementation, as their perspectives would help clarify institutional constraints and inform targeted recommendations for reform. Finally, given the significant delays in the delivery of the scheme, further research is warranted to assess the remaining phases of its implementation, as recommended in section 4.1. The ABICAP project was constrained by the incomplete nature of the programme's delivery and progress in application processing. As such, a more comprehensive assessment should be undertaken once the scheme has advanced beyond its current phase.

Going beyond the three climate action schemes discussed above, future assessments should adopt a similarly multidisciplinary approach to examine administrative procedures across a broader range of climate actions outlined in Ireland's NCAPs. The methodology employed in this study proved effective in generating practical, stakeholder-informed insights and should be applied to additional schemes to identify and mitigate bureaucratic inefficiencies. Future research should prioritise the assessment of actions identified during this project as having high potential for administrative friction. These include 'TR/23/56: Advance Local Authority Residential Charging Scheme and Shared Charging App

Pilot'; 'BE/23/10: Deliver Retrofits and Heat Pump Installations'; 'EL/23/8: Offshore Wind Consent Process'; and various licensing schemes under the DAFM remit (see Table 2.1 and Appendix 1 for further actions that may have administrative frictions worthy of further examination). With the new carbon budgets and 2026 Climate Action Plan to be approved shortly, this work to address administrative frictions impacting the implementation of climate actions is timely. Additionally, future research should continue to apply and refine the typology of indirect costs used in this project to assess administrative frictions. A standardised framework for capturing search, evaluation, implementation, psychological, time and financial costs across schemes would enable cross-cutting comparisons and support the development of system-wide recommendations to reduce administrative frictions and improve policy delivery.

Stakeholder insights informed recommendations aimed at supporting future efforts in conducting assessments on administrative frictions in the climate policy context, as described in section 2.4. One area of future research arising from these insights would be to conduct internal, department-led workshops on burden reduction in climate policy instead of the external ones completed in this research, where internal department experts may have more buy-in to improve department services and have access to valuable protected data sources, such as applicant retention statistics.

The public survey analysing vulnerability to and the acceptability of administrative burdens, described in Chapter 3, identified the following five possible areas of future research:

1. **Causal impacts of mental health on burden vulnerability and acceptability.** Future experimental efforts should causally identify the pathways by which poor mental health contributes to cognitive energy scarcity and, in turn, increasing vulnerability to and reducing acceptability of administrative burdens.
2. **Longitudinal impacts and learning effects from repeated administrative frictions.** The survey analysis suggests that repeated exposure to administrative burdens causes adaptation or learning effects, potentially reducing an individual's vulnerability to friction over time. Future research should explore this hypothesis through longitudinal
- designs to assess if such effects exist and, if so, under what conditions they occur.
3. **Broadening the scope of individual-level characteristics of burden impact.** Future experimental research on administrative burdens should extend beyond the characteristics assessed in the current study, such as mental health, to include variables like present bias, optimism bias, ambiguity aversion, personality traits, time scarcity, task complexity and the nature of the burden itself. These factors could be tested to evaluate their influence on individuals' performance and response to incentivised administrative tasks.
4. **Expanding the typology of administrative burdens beyond contexts studied.** Future research should investigate a broader range of administrative burdens, including those more commonly encountered outside traditional public service contexts. For example, cancelling memberships is frequently cited as an example of a burdensome task, yet it could not be included in the survey study because it was difficult to translate into a public sector context. Future research could test whether such tasks impose burdens comparable to those in public contexts, and whether these burdens can be translated into public sector analogues. While most of the research related to administrative burdens focuses on grants and schemes with low uptake, there is a significant evidence gap on the potential role of administrative frictions in policies that do not involve applying for government funding or licensing. This could become especially problematic if climate policy pivots from the current model of trying to incentivise the take-up of renewables and other technologies towards a more all-encompassing model involving, for example, bans, restrictions or mandates, where frictions could impede compliance.
5. **Cross-national application of friction assessment methodologies.** In the present study, participation was limited to residents of Ireland. Thus, future research should adapt these methodologies to test whether the patterns found in Ireland are similar to those found in other countries.

The survey experiment also yields the following possibilities for future research:

- **Cross-national validation of experimental findings.** As the experiment was conducted with a UK-based sample, future studies should replicate the design using nationally representative samples from Ireland and other countries to assess the generalisability of the findings across different administrative and cultural contexts.
- **Real-world behavioural consequences of sludge.** While the current study used incentivised comprehension tasks, which is standard in experimental economics, future experiments should explore how varying levels of

administrative friction affect real-world behaviours in field studies and randomised controlled experiments, such as application completion rates, decision quality or user persistence in public service processes.

- **Design interventions to mitigate comprehension loss.** Future research should test specific design-based interventions, such as plain language summaries, interactive support tools or adaptive interfaces, that may reduce the negative effects of high-sludge environments (which may sometimes be justified) on comprehension and task success, especially for individuals with lower administrative or digital literacy levels.

References

- Baekgaard, M., Döring, M. and Thomsen, M.K. (2025). It's not merely about the content: How rules are communicated matters to administrative burden. *Public Administration Review*, 85(1), 107–127.
- Christensen, J., Aarøe, L., Baekgaard, M., Herd, P. and Moynihan, D.P. (2020). Human capital and administrative burden: the role of cognitive resources in citizen–state interaction. *Public Administration Review*, 80(1), 127–136.
- DAFM (Department of Agriculture, Food and the Marine) (2023). *Afforestation Scheme 2023–2027*. Available online: <https://assets.gov.ie/static/documents/afforestation-scheme-2023-2027.pdf> (accessed 23 November 2025).
- DAFM (Department of Agriculture, Food and the Marine) (2024). *Forest Statistics Ireland 2024*. Available online: <https://assets.gov.ie/static/documents/forest-statistics-ireland-2024.pdf> (accessed 23 November 2025).
- Department of Health (2024). Did not attends (DNAs) for outpatient hospital appointments can be reduced by 13% using behaviourally informed SMS reminders. Press release. Available online: <https://www.gov.ie/en/department-of-health/press-releases/did-not-attends-dnas-for-outpatient-hospital-appointments-can-be-reduced-by-13-using-behaviourally-informed-sms-reminders/> (accessed 14 November 2025).
- Government of Ireland (2021). Climate Action and Low Carbon Development (Amendment) Act 2021. S.I. No. 32 of 2021. Government Publications Office, Dublin.
- Government of Ireland (2022). *Climate Action Plan 2023*. Available online: <https://assets.gov.ie/static/documents/climate-action-plan-2023-8b7dba92-f397-4163-8293-3aea656f6b5f.pdf> (accessed 23 November 2025).
- Halling, A., Herd, P. and Moynihan, D. (2023). How difficult should it be? Evidence of burden tolerance from a nationally representative sample. *Public Management Review*, 25(11), 2053–2072.
- Heinrich, C.J. (2016). The bite of administrative burden: a theoretical and empirical investigation. *Journal of Public Administration Research and Theory*, 26(3), 403–420.
- Herd, P. and Moynihan, D.P. (2019). *Administrative Burden: Policymaking by Other Means*. Russell Sage Foundation, New York, NY.
- Herd, P., DeLeire, T., Harvey, H. and Moynihan, D.P. (2013). Shifting administrative burden to the state: the case of Medicaid take-up. *Public Administration Review*, 73(s1), 569–581.
- Herd, P., Hoynes, H., Michener, J. and Moynihan, D. (2023). Introduction: administrative burden as a mechanism of inequality in policy implementation. *RSF: The Russell Sage Foundation Journal of the Social Sciences*, 9(4), 1–30.
- Lades, L.K., Samahita, M., Martin, L., Sunstein, C.R. and Baekgaard, M. (2025). Vulnerability to and acceptability of different types of sludge. *Behavioural Public Policy*, 1–30. <https://doi.org/10.1017/bpp.2025.10020>.
- Lentz, P., Augustenborg, C. and Lades, L. (2024). *Reducing Administrative Frictions in Ireland's Afforestation Scheme*. EPA Research. Available online: https://publicpolicy.ie/environment/reducing-administrative-frictions-in-irelands-afforestation-scheme/#_edn8 (accessed 23 November 2025).
- Lentz, P., Augustenborg, C. and Lades, L. (2025a). *Improving Engagement with Ireland's Solar Schools Scheme by Reducing Administrative Frictions*. EPA Research. Available online: <https://publicpolicy.ie/environment/improving-engagement-with-irelands-solar-schools-scheme-by-reducing-administrative-frictions/> (accessed 23 November 2025).
- Lentz, P., Augustenborg, C. and Lades, L. (2025b). *Administrative Frictions in Ireland's Shared Island Sports Club EV Charging Scheme*. EPA Research. Available online: <https://publicpolicy.ie/environment/administrative-frictions-in-irelands-shared-island-sports-club-ev-charging-scheme/> (accessed 23 November 2025).
- Martin, L. (2024). The intra-household distribution of administrative burdens. *Economic and Social Review*, 55(3), 387–456.
- Moynihan, D., Herd, P. and Harvey, H. (2015). Administrative burden: learning, psychological, and compliance costs in citizen–state interactions. *Journal of Public Administration Research and Theory*, 25(1), 43–69.

- New South Wales Behavioural Insights Unit (2024). *The New South Wales Government Sludge Audit Method Guide*. Available online: <https://www.nsw.gov.au/departments-and-agencies/behavioural-insights-unit/sludge-toolkit/download-sludge-audit-method-guide> (accessed 23 November 2025).
- OECD (Organisation for Economic Co-operation and Development) (2024). Fixing frictions: “Sludge audits” around the world. *OECD Public Governance Policy Papers*, No. 48, OECD Publishing, Paris. <https://doi.org/10.1787/5e9bb35c-en>.
- OIRA (Office of Information and Regulatory Affairs) (2024). *Tackling the Time Tax: Making Important Government Benefits and Programs Easier to Access*. Available online: <https://bidenwhitehouse.archives.gov/wp-content/uploads/2024/07/OIRA-2024-Burden-Reduction-Report.pdf> (accessed 23 November 2025).
- Rockwell, M.S., Frazier, M.C., Stein, J.S., Dulaney, K.A., Parker, S.H., Davis, G.C., Rockwell, J.A., Castleman, B.L., Sunstein, C.R. and Epling, J.W. (2023). A “sludge audit” for health system colorectal cancer screening services. *American Journal of Managed Care*, 29(7), 222.
- Shahab, S. and Lades, L. (2024). Sludge and transaction costs. *Behavioural Public Policy*, 8(2), 327–348.
- Sunstein, C.R. (2016). Do people like nudges? *Administrative Law Review*, 68, 177.
- Sunstein, C.R. (2021). *Sludge: What Stops Us from Getting Things Done and What to Do about It*. MIT Press, Cambridge, MA.
- Sunstein, C.R. (2022). Sludge audits. *Behavioural Public Policy*, 6(4), 654–673.

Appendix 1 Actions Identified in Ireland's 2023 Climate Action Plan That May Contain Administrative Burdens

The actions identified in Ireland's 2023 Climate Action Plan (see Table A1.1) are based on a rapid preliminary screening conducted by 17 researchers in University College Dublin's Environmental Policy

MSc programme in 2024. It is therefore not a fully comprehensive analysis, and more research would be required within each action to determine if administrative burdens are present.

Table A1.1. Actions identified in Ireland's 2023 Climate Action Plan by sector

Action ID	Action summary	Justification
Adaptation		
AD/23/14	Improve resilience of water infrastructure to the impacts of climate change	In Ireland, 38% of treated water leaks out of pipes before it reaches its destination. The government pledged €250 million per annum to improve this infrastructure. Potential administrative burdens can occur during the implementation of this action, such as infrastructure permitting delays, staff and expertise shortages, and the complexity of multiple bodies playing a role in water resilience (e.g. Uisce Éireann, the Office of Public Works and the Department of Housing, Local Government and Heritage)
AD/23/15	Understanding health impacts of climate change in Ireland through research to obtain baseline information on impacts of severe weather, flooding and drought on public health	Severe weather, drought and flooding will become common as climate change worsens. Disaggregated information and data access restrictions could impact the implementation of this action, as accessing sensitive data requires lengthy ethical reviews or GDPR compliance. Thus, correlating health consequences within severe weather information may be difficult
Agriculture		
AG/23/9	Provide financial support to farmers who convert to organic farming	Organic farming has been encouraged as a more sustainable way to farm and has been introduced in many places at different levels, but financing the conversion can be an obstacle to increasing uptake, with grant schemes often not covering all costs (e.g. training or certification). Previous support schemes were allocated by agricultural branches/sectors, which increased administrative workloads
AG/23/14	Seek financial opportunities for capital support for the development of the biomethane industry	Biomethane can provide renewable energy through residues from the agricultural sector. However, its implementation in Ireland has been difficult due to investment issues and departmental responsibilities. Significant capital requirements can slow construction of plants, with an estimated €2 billion required to meet Ireland's 2030 target. Public perception may also emerge as an obstacle to implementation
AG/23/10	Mobilise recommendations of FoodVision sectoral groupings and support land use diversification options for livestock farmers, such as anaerobic digestion, forestry and tillage, to incentivise voluntary livestock reductions	The implementation of this action could face administrative burdens caused by stakeholder objections, lack of certainty, unclear planning protocols or funding requests. Additionally, overlapping and potentially inconsistent guidance may be provided to farmers through different stakeholder bodies
AG/23/1	Introduce a national fertiliser database	The establishment of a national fertiliser database was part of the 2021 Climate Action Plan, but as of Q3 2022 it was delayed. Concerns have been raised about a potential increase in administrative burdens due to the management and use of this database. Users may lack the technological literacy required to use the platform, as many already rely on consultants to help with applications for agriculture payments and schemes online

Table A1.1. Continued

Action ID	Action summary	Justification
AG/23/5	Provide data and analysis to farmers on the benefits of improved animal feeding through knowledge transfer	The provision of fodder information to farmers through knowledge transfer has the potential to create indirect costs, through high search and evaluation costs. The process of knowledge transfer in policymaking must have sufficient resources to share the relevant information, accurate and universal data for farmers to comprehend and a trustworthy rapport with farming communities. After a costly and stagnant year for animal fodder, it will be difficult to encourage farmers to change their practices and potentially incur higher indirect and direct costs for feed. Barriers can occur in the use of knowledge transfer due to lack of trust, superstition and differences in educational backgrounds
Land use and forestry		
LU/23/1	Develop, assess and adopt as appropriate the new Forestry Programme 2023–2027, which aims to introduce new afforestation measures and increase financial support	Progress in this action is delayed, with behavioural barriers, such as perception of the irreversibility of afforestation, and intergenerational issues preventing a shift in land use to forestry. Additional bureaucratic burdens may include complexity and delays in the forestation licensing process and a lack of confidence in forest policy. Proper and timely implementation of this measure will require a multifunctional and collaborative approach between stakeholders and sectors to reduce friction and build confidence in forestry policymaking
LU/23/12	Aim to improve peatland mapping by continuing to fund the RePEAT Project	The RePEAT Project is a national digital mapping initiative that combines historical and current data to investigate peatland extent and land use change, supporting carbon sequestration and climate mitigation. The updated peatland soil map, due by Q1 2025, will inform strategic planning and 2023 Climate Action Plan implementation. However, several administrative burdens may affect its delivery, including coordination across multiple agencies, data access challenges, GDPR and landowner consent for work, and the short-term nature of project funding. The project also requires extensive field studies to ensure accuracy, but delays in data sharing or logistical permissions could hinder progress and impact the readiness of the final map
LU/23/8	The Nitrates Directive imposes mandatory requirements under derogation to enhance carbon sequestration	The derogation application process may be complex, and additional regulations might add to the existing burdens associated with the Nitrates Directive. Farmers may face barriers to participation due to knowledge gaps and uncertainty in the carbon sequestration process, ultimately impacting programme retention rates
LU/23/13	Leverage opportunities from the EU Just Transition Fund to support research, knowledge transfer and monitoring activities of farmed peat soils	This action was implemented to embrace the support offered by the EU Just Transition Fund in the form of research, knowledge transfer and monitoring activities of farmed peat soils. Potential issues related to bureaucratic inefficiency could emerge, such as complex application forms, relationships between Ireland and EU representatives and funding distribution
LU/23/16	Seek opportunities for public and private funding of peatland rehabilitation	The implementation of this action could face administrative burdens associated with the funding of the rehabilitation and application requirements. There are multiple funding sources available through DAFM schemes, EU-LIFE and the Just Transition Fund, all requiring highly technical applications. In the context of peatland rehabilitation, funding applications could require detailed site assessments, community engagement plans and ecological surveys. Without advisory support for applicants, it could be difficult for small NGOs, farmers or local authorities to apply, due to lack of expertise or capacity for these requirements
LU/23/6	Continue to fund the Straw Incorporation Measure	Continuation of the Straw Incorporation Measure is included in both the 2021 and 2023 Climate Action Plans to support sustainable tillage practices (chopping or straw incorporation) that increase soil organic carbon levels. The pilot project was operational at the end of 2022 and received over 2400 applications. Notwithstanding the success of the pilot, the complex application process may have an impact on the expansion of the project. While fulfilling their Basic Payment scheme, the procedure may be difficult to understand and prevent some farmers from applying. Despite this, several websites are available to help farmers with their application
Built environment		
BE/23/10	Support those least able to afford to retrofit	To tackle fuel poverty and increase energy efficiency, low-income households must be supported with retrofitting. The unaffordable upfront costs of retrofit represent a significant barrier, with 90% of low-income households citing the cost of energy efficiency measures as the biggest barrier to investing. Even where there is financial support available for retrofit, the execution of this action depends on the appropriate design of funding schemes. For example, long payback periods, prescriptive reporting requirements or complex application processes could present barriers for those wishing to access funds. Poor literacy levels or lack of internet access and information may heighten administrative burdens for some low-income households. In addition, a lack of awareness about individual eligibility may also present a barrier. For instance,

Table A1.1. Continued

Action ID	Action summary	Justification
BE/23/34	Expansion of retrofit in the education and further and higher education sectors	if low-income households do not have all the information that they need to access the scheme, or if they feel embarrassed about applying, this will result in poor uptake. Lack of institutional trust in government or retrofit providers may also impact uptake and the public perception of retrofit grants The expansion of retrofitting across the education and further and higher education sectors may create uneven administrative burdens, particularly for institutions with fewer resources or technical capacity. Schools and colleges must navigate complex eligibility rules and invest time in identifying suitable funding schemes, resulting in high search and learning costs. The application process itself may be paperwork-heavy, requiring technical data, building audits and planning permissions. These burdens could fall disproportionately on secondary schools, which historically receive less capital investment than primary or third-level institutions. Even when applications are submitted, funding may be delayed or denied, leading to frustration and wasted effort. Delays may worsen if labour shortages in the retrofit sector continue. Without targeted support to reduce these administrative and procedural barriers, the implementation risks reinforcing existing inequalities across the education system
BE/23/16	Increase the number of new registered retrofit providers and BER assessors	This action relates to the supply chain, skills and standards for residential retrofit. It is directly related to the long waiting time for work to be done and the standardisation of the work quality. Recent reports have identified the availability of skilled contractors as a key barrier to achieving the retrofit targets. Specific barriers to ensuring the quality of work in retrofitting practice include low-quality audits, lack of openness to new solutions, lack of standards, variation in performance measures and the need for proven, highly dependable solutions. In addition, further studies on contractors' behavioural barriers when adapting new forms of work and technology may help inform policymaking
BE/23/12	Deliver low-cost finance for home retrofit to consumers	The delivery of low-cost funding for home retrofits may face administrative burdens related to consumers seeking information about funding opportunities, making informed decisions on retrofit and funding options or undertaking complex application processes. Information about funding opportunities and suitable contractors can be difficult to find, which can impact consumers' willingness to participate. Likewise, consumers may deal with information overload, with some level of technical knowledge required to compare options. Applications for funding may be complex, requiring communication with the grant administrator and contractors. The organisation of site visits may lead to householders withdrawing their grant applications midway. Psychological burdens related to anticipation and frustration may also impact the consumer
BE/23/11	Continue roll-out of the Social Housing National Retrofitting Programme, with retrofitted properties to reach a BER of B2 or equivalent and incorporating heat pump targets	The continued delivery of the Social Housing National Retrofitting Programme can create indirect costs for applicants, including evaluation costs and psychological costs. If applicants are faced with high upfront costs, it can warp the perception of overall potential savings, impacting their initial decision-making. The anticipated disturbances linked to the installation process inside the house may also be a deterrent to applicants
BE/23/13	Introduce a new tax incentive to encourage small-scale landlords to undertake retrofitting works while tenants remain <i>in situ</i>	Encouraging landlords to retrofit is vital for the successful delivery of retrofit across Ireland, with one in five households in Ireland renting privately. Rental properties are also some of the most energy inefficient, with over 50% of private rental properties scoring a BER of D or lower. Even with a tax incentive, multiple barriers may stand in the way of retrofitting rental properties, such as a lack of time, the perceived size of the task or the trade-off between purchase price and life cycle cost, especially if there is lack of clarity regarding the tax incentive. The split incentive (the landlord is the payer, but not the user) may also be a barrier. Finally, lack of guidance on how to carry out retrofit work while tenants remain "<i>in situ</i>" as well as uncertainty over protections for tenants could present barriers. Tenants may also be apprehensive about the time requirement or disruption of the retrofit project and fear that landlords could increase their rent as a result
BE/23/31	Promote statutory requirement for the installation of building automation systems with a heating/cooling load greater than 290kW	The statutory requirement to install building automation and control systems in existing buildings with heating or cooling loads above 290kW, excluding dwellings, must be implemented by 31 December 2025. However, this regulation may create disproportionate administrative burdens and fairness concerns, particularly in sectors such as education and public services. Buildings like schools or libraries may exceed the 290kW threshold due to their function yet lack the funding or capacity to comply. In contrast, some inefficient buildings under the threshold may escape the requirement altogether. Determining eligibility requires technical audits and specialist input, posing learning and compliance costs for building owners. Further burdens may arise from planning and procurement documentation, coordination with contractors

Action ID	Action summary	Justification
		and uncertainty around enforcement mechanisms. The 290kW threshold may not reflect building purpose or energy performance, risking both inequitable outcomes and missed opportunities for broader energy efficiency improvements
Electricity		
EL/23/6	Ensure electricity generation grid connection policies and regular rounds of connection offers that facilitate timely connecting of renewables, provide a locational signal and support flexible technologies	This action highlights a major administrative barrier to accelerating renewable electricity in Ireland: the grid connection process. For small-scale or community-led projects, application fees may pose an additional burden. These procedural constraints may impose significant search, compliance and delay costs on applicants and slow down renewable deployment. If the Commission for Regulation of Utilities, EirGrid and ESB Networks are to meet the 2023 Climate Action Plan targets, they must reduce these administrative barriers and streamline the connection process to support timely and equitable access to the grid
EL/23/10	Deliver onshore and offshore RESS auctions as per the annual RESS auction calendar	While the State has proven it can run RESS auctions on schedule, such as the Q4 2022 round, delivering them effectively can involve significant administrative burdens. To ensure that these auctions are not only timely but economically efficient, relevant departments must assess technology costs and grid readiness and ensure that auction designs align with Ireland's broader decarbonisation strategy. These tasks require specialised expertise and coordination, placing a substantial burden on public officials. Nonetheless, since the government is committed to achieving its emission reduction goals in this sector primarily through public-private partnerships, ensuring these auctions occur frequently and to the economic advantage of the State is critical
Marine		
MA/23/3	Progress designation of marine special areas of conservation and special protection area sites, prioritised in line with the government decisions	Increasing the coverage of marine protected areas will be vital to meet national biodiversity targets. However, top-down governance could result in local opposition to a project when community buy-in is needed to achieve conservation goals. Ignoring social and economic consequences of environmental protection measures may create an implementation barrier, making it difficult to enforce protection measures and manage the marine protected areas. Managing marine protected areas also requires specialist knowledge and expertise, and it could be challenging to find staff with these operational and marine management skills. There may also be associated financial burdens associated with monitoring and measuring the sites. Finally, managing coastal borders may present challenges when it comes to shared international waters
MA/23/4	Progress mapping of Irish offshore waters through the INFOMAR programme to support marine activities, including climate effect monitoring and site selection for offshore energy	Poor management and limited regulation of offshore projects can be a barrier to successful site selection for offshore energy. While the potential for growth in this sector is evident, there is a deficiency of research and monitoring, and restricted finances as regards staff and upkeep. Some communities could present challenges to site selection due to their reliance on the marine environment for fishing
MA/23/11	Improve ocean climate literacy	Improving ocean climate literacy may face administrative burdens across education and policymaking. In secondary education, constrained curricula, limited teacher training and lack of classroom resources hinder the integration of new topics. At the policy level, civil servants and decision-makers may lack the time, training pathways or incentives to build ocean literacy. Addressing these gaps requires not just content development, but also curricula reforms, professional development programmes and cross-sector coordination, each of which carries administrative complexity and resourcing demands
Transport		
TR/23/55	Advance Destination Charge Point Scheme, including sports clubs, community centres and State-operated visitor sites, as well as commercial destinations	The grants described in this action fall under the Shared Ireland Sports Club EV Charging Scheme administered by Pobal. Administrative barriers may lie in the minimum requirements to be eligible for the grant. Clubs and centres are often run on a voluntary basis. Thus, compiling this information and submitting evidence of minimum requirements may stretch their limited resources. Administrative barriers may also lie within the governing bodies, which may be inundated with requests and unable to submit proposals within the deadlines. In addition, administrative burdens may emerge if clubs go through the full application process, incurring associated costs, but are deemed ineligible at a late stage

Action ID	Action summary	Justification
TR/23/54	Develop incentives to promote access to or purchase of e-cargo and e-bikes as viable alternatives to private car use	While incentives like the Bike-to-Work Scheme aim to encourage e-bike use, they can be limited in accessibility and equity. The scheme operates through a tax return model, requiring users to navigate complex rules, potentially leading to high search and compliance costs. Employers act as intermediaries, setting conditions on where bikes can be purchased and managing payments and salary deductions, which may create friction for both employees and employers. Moreover, eligibility is restricted to PAYE workers, excluding the self-employed, retirees, carers, students and others. Because the benefit is tax based, it disproportionately advantages higher earners. e-bike and e-cargo incentives must address these administrative hurdles to ensure broader uptake and fair access
TR/23/56	Advance Local Authority Residential Charging Scheme and shared charging app pilot	The residential charging scheme proposed a co-funding of 75% by local authorities for the installation of charging points in residential areas. In order to apply, local authorities must develop the entire project, from maintenance to customer support, and determine the ideal number and location of charging points. As of January 2023, only four local authorities have joined the charging scheme, indicating potential barriers to participation. Local authorities also incur costs in the process to apply for and abide by guidelines to receive the €5000 grant to join the scheme
TR/23/29	Advance roll-out of 1000 km walking/cycling infrastructure	Agencies responsible for development of pedestrian and cycling infrastructure face significant implementation barriers, including funding constraints, jurisdictional coordination issues, challenges in regulatory compliance, limited staff capacity and difficulty confronting pre-existing car-oriented development and planning. Administrative burdens, particularly surrounding planning and cost, must be promptly addressed in early stages of development
TR/23/5	Local authorities to identify roads and streets suitable for road space reallocation	The 2023 Climate Action Plan proposes road space reallocation by local authorities, which may face administrative barriers in relation to the process of public participation and acceptance. This proposed action faces concerns over scheme funding, public resistance and public trust. Furthermore, local authorities may incur search and evaluation costs to determine the optimal locations for road space reallocation

BER, Building Energy Rating; GDPR, General Data Protection Regulation; INFOMAR, integrated mapping for the sustainable development of Ireland's marine resource; NGO, non-governmental organisation; PAYE, Pay As You Earn; RESS, Renewable Electricity Support Scheme.

Appendix 2 List of Project Outputs

- Augustenborg, C.A. and Lentz, P. in association with Aiken PR (in press). Video: Reducing administrative frictions in Ireland's Afforestation Scheme. Approved by the Environmental Protection Agency, Johnstown Castle, Ireland, September 2025.
- Augustenborg, C.A. and Lentz, P. in association with Aiken PR (in press). Video: Improving engagement with Ireland's solar schools scheme by reducing administrative frictions. Approved by the Environmental Protection Agency, Johnstown Castle, Ireland, September 2025.
- Augustenborg, C.A. and Lentz, P. in association with Aiken PR (in press). Video: Administrative frictions in Ireland's Shared Island Sports Club EV Charging Scheme. Approved by the Environmental Protection Agency, Johnstown Castle, Ireland, September 2025.
- Augustenborg, C.A., Lades, L.K. and Lentz, P. (in review). *Reducing Administrative Frictions in Ireland's Climate Action Plan: Lessons from Three Case Studies*. Awaiting approval from the Environmental Protection Agency, Johnstown Castle, Ireland, submitted 8 July 2025.
- Augustenborg, C.A., Lentz, P., Hardgrave, L. and Lades, L.K. (in press). *From Friction to Function – Stakeholder Insights on Administrative Burdens in Climate Policy*. Policy brief. Approved by the Environmental Protection Agency, Johnstown Castle, Ireland, September 2025.
- Lades, L. and Martin, L. (2024). *Interview Guide: Identifying "Sludge" in Climate Action*. OSF. <https://doi.org/10.17605/OSF.IO/32WTA>.
- Lades, L.K., Samahita, M., Martin, L., Sunstein, C.R. and Baekgaard, M. (2025). Vulnerability to and acceptability of different types of sludge. *Behavioural Public Policy*, 1–30. <https://doi.org/10.1017/bpp.2025.10020>.
- Lades, L.K., Lentz, P., Martin L. and Augustenborg, C. (in review). Does sludge slow down the solar schools scheme? An assessment of administrative burdens preventing climate action in Ireland. *Energy Policy*, submitted 12 June 2025.
- Lades, L.K. and Samahita, M. (in press). *Understanding and Addressing Sludge to Improve Service Delivery and Reduce Inequality*. Policy brief. Approved by the Environmental Protection Agency, Johnstown Castle, Ireland, September 2025.
- Lentz, P., Augustenborg, C. and Lades, L. (2024). *Reducing Administrative Frictions in Ireland's Afforestation Scheme*. EPA Research. Available online: https://publicpolicy.ie/environment/reducing-administrative-frictions-in-irelands-afforestation-scheme/#_edn8 (accessed 23 November 2025).
- Lentz, P., Augustenborg, C. and Lades, L. (2025). *Administrative Frictions in Ireland's Shared Island Sports Club EV Charging Scheme*. Available online: <https://publicpolicy.ie/environment/administrative-frictions-in-irelands-shared-island-sports-club-ev-charging-scheme/> (accessed 23 November 2025).
- Lentz, P., Augustenborg, C., Lades, L. and Martin, M. (2025). *Improving Engagement with Ireland's Solar Schools Scheme by Reducing Administrative Frictions*. Available online: <https://publicpolicy.ie/environment/improving-engagement-with-irelands-solar-schools-scheme-by-reducing-administrative-frictions/> (accessed 23 November 2025).
- Lentz, P., Augustenborg, C.A. and Lades, L.K. (in review). Administrative burdens as barriers to afforestation: a sludge audit of Ireland's Afforestation Scheme. *Journal of Rural Studies*, submitted 2 December 2024. <https://osf.io/mf37p/> (accessed 23 November 2025).
- Martin, L., Condon, D. and Lades, L.K. (2023). *Living Literature Review*. Available online: <https://sites.google.com/ucd.ie/burdensireland/living-review> (accessed 23 November 2025).
- McNamara, G., Lades, L.K. and Samahita, M. (in press). *Who is Most Influenced by Sludge? Experimental Evidence*. Approved by the Environmental Protection Agency, Johnstown Castle, Ireland, September 2025.

Appendix 3 Examples of Treatments in Experiment

A3.1 Low Sludge

2

Key Information

Oversight: A Fund Committee, including community volunteers, the developer, and an administrator, decides on funding allocations.

Highlight Long-Term Impact: Explain how your project will continue to benefit the community or environment beyond the initial funding period.

Provide a Detailed Plan: Include clear objectives, a step-by-step implementation timeline, and a comprehensive budget breakdown with supporting documents.

Sustainable Development Projects: Priority is given to projects that address UN Sustainable Development Goals 4, 7 & 11

Source: reproduced from Lades *et al.* (2025); licensed under CC BY 4.0 (<https://creativecommons.org/licenses/by/4.0/>).

A3.2 Medium Sludge

2

How the Fund Operates

Purpose: The fund ensures local communities benefit from hosting renewable energy projects, supporting social, environmental, and economic initiatives.

Funding Source: Renewable energy developers contribute €2 per megawatt-hour of electricity generated.

Oversight: A Fund Committee, including community volunteers, the developer, and an administrator, decides on funding allocations.

Transparency: The Sustainable Energy Authority of Ireland (SEAI) oversees compliance and maintains a public register of funded projects.

Fund Distribution

Near Neighbour Payments: For wind farms, €1,000/year for households within 1 km.

Sustainable Development Projects: Minimum 40% allocated to UN SDGs.

Administration Costs: Maximum 10% for managing the fund.

Local Initiatives: Remaining balance for community clubs, societies, and projects.

Key Application Requirements

Address Community Needs: Clearly demonstrate how your project benefits the local community, such as improving facilities, social inclusion, or environmental sustainability.

Align with SDGs: Focus on projects that promote clean energy, climate action, quality education, or sustainable communities, as these are priorities for the fund.

Provide a Detailed Plan: Include clear objectives, a step-by-step implementation timeline, and a comprehensive budget breakdown with supporting documents.

Engage the Community: Show evidence of collaboration with local groups or stakeholders to strengthen your proposal's impact and reach.

Tips for a Strong Application

Highlight Long-Term Impact: Explain how your project will continue to benefit the community or environment beyond the initial funding period.

Be Transparent: Ensure your application outlines responsible fund usage and includes any required tax or governance compliance.

Proximity: Projects directly benefiting communities within 10 km of the renewable project are given priority.

Demonstrate Feasibility: Show that your project is achievable, providing evidence of necessary approvals or resources.

Source: reproduced from Lades *et al.* (2025); licensed under CC BY 4.0 (<https://creativecommons.org/licenses/by/4.0/>).

A3.3 High Sludge

A3.3.1 Introduction

The Community Benefit Fund (CBF) is a statutory initiative established under the framework of the Renewable Energy Development Act 18:40§. It is a mandatory requirement for renewable energy developers operating within the jurisdiction of Bioland to establish and contribute to such funds as a condition of project approval. The fund is governed by the Community Benefit Fund Regulations 2025 ("CBF Regulations") and is designed to provide tangible, quantifiable benefits to communities hosting renewable energy projects. The purpose of the CBF is to promote social, environmental and economic well-being in communities directly impacted by renewable energy infrastructure. This aligns with the government's broader commitment to sustainability and community engagement and the achievement of national targets under the Global Clean Energy Accord. Developers are required to allocate contributions of €2 per megawatt-hour (MWh) of electricity generated by their projects to the fund, creating a direct financial link between renewable energy production and local development.

In accordance with the CBF Regulations and the compliance framework of the EPSS, the

administration and distribution of the fund are subject to strict governance standards. These include the establishment of a Fund Committee composed of local representatives, developers and administrators to ensure that decisions are made transparently and in alignment with the fund's objectives. Furthermore, the EPSS is tasked with ensuring compliance through periodic audits, reporting requirements and the maintenance of a public register of funded projects.

This handbook is intended to provide all stakeholders – community members, developers, fund administrators and policymakers – with clear guidance on the establishment, operation and governance of the CBF. It outlines the key principles and mandatory provisions set forth under the CBF Regulations, offering a roadmap to ensure the effective and equitable use of these resources. Stakeholders should note that compliance with the regulations and the terms and conditions outlined herein is a prerequisite for fund eligibility and continued participation.

The government recognises that communities are essential partners in the renewable energy transition. Through this fund, we aim to create a legacy of sustainable growth, local empowerment and shared prosperity, ensuring that the benefits of renewable energy extend far beyond the grid.

A3.3.2 Key stakeholders

The success of the CBF depends on the collaboration and commitment of several key stakeholders. Each plays a distinct yet interconnected role in ensuring that the fund operates efficiently, transparently and to the benefit of the local communities hosting renewable energy projects. The primary stakeholders involved include the community, the Fund Committee, the developer, the administrator and the oversight authority.

The community

The local community is at the heart of the CBF. As the host of renewable energy projects, the community comprises residents, organisations and groups within a defined area – typically a 10-kilometre radius of the project. These communities are the primary beneficiaries of the fund, with projects tailored to address their specific social, environmental and economic needs.

Community members are also integral to the governance of the fund, with many participating directly in the Fund Committee. Their involvement ensures that the distribution of funds reflects local priorities and delivers meaningful, long-term benefits.

The Fund Committee

The Fund Committee serves as the governing body responsible for evaluating and approving funding applications. This group is composed of volunteer representatives from the local community, the renewable energy developer and the fund administrator. Its primary roles include:

- developing a funding strategy in consultation with the community;
- assessing applications against the fund's objectives and priorities;
- ensuring the fair and transparent allocation of resources.

A diverse composition of the Fund Committee – balancing gender, age, profession and geographical representation – ensures that it reflects the community's interests and values. While the committee leads decision-making, its actions are guided by the principles outlined in the CBF governance framework.

The developer

The renewable energy developer is the entity responsible for the construction and operation of the project that generates the CBF contributions. As a key contributor, the developer allocates €2 per MWh of electricity generated into the fund. Beyond financial contributions, the developer plays a key role in fostering relationships with the local community, publicising the fund and supporting the Fund Committee with technical or logistical resources.

The developer's collaboration with community stakeholders is crucial to the fund's success. Their commitment to transparency and accountability strengthens community trust and ensures the fund achieves its objectives.

The administrator

The administrator oversees the day-to-day operation of the CBF, ensuring that processes are efficient and compliant with the fund's governance guidelines. This role may be fulfilled by a third-party organisation, the developer or a local entity with the capacity to manage administrative functions. Key responsibilities of the administrator include:

- facilitating the formation of the Fund Committee;
- managing the application process and maintaining records of decisions and fund allocations;
- providing guidance to the Fund Committee on best practices and governance standards;
- reporting to the oversight authority on the fund's activities and outcomes.

The administrator ensures that the fund operates smoothly and transparently, acting as a bridge between the Fund Committee and other stakeholders.

The oversight authority

The EPSS serves as the compliance and oversight authority for the CBF. This organisation ensures that the fund adheres to national guidelines and best practices while supporting stakeholders with resources, training and dispute resolution. Responsibilities include:

- establishing a public register of funded projects to promote transparency;

- conducting periodic audits to ensure accountability;
- providing education and capacity-building opportunities for community stakeholders;
- acting as a neutral arbiter in disputes related to the fund's operation.

By fostering a robust framework of oversight and support, the EPSS ensures the long-term success and integrity of the fund, enabling it to achieve its mission of benefiting communities sustainably.

A3.3.3 Key fund parameters

The CBF operates under a set of clearly defined parameters designed to ensure equitable distribution, transparent management and alignment with national and local development objectives. These parameters are mandated under the CBF Regulations and form the basis for the fund's governance, allocation and compliance requirements. Key parameters are outlined below.

Monetary value of the fund

The monetary value of the CBF is calculated based on contributions from renewable energy developers, set at a fixed rate of €2 per MWh of electricity generated by the project. This contribution mechanism ensures a consistent and predictable flow of funds into local communities over the lifetime of the renewable energy project, typically 15 years. For example:

- A 10 MW wind farm generating approximately 30,000 MWh annually would contribute €60,000 per year.
- A 50 MW solar farm generating approximately 40,000 MWh annually would contribute €80,000 per year.

The fund is not subject to Consumer Price Index adjustments. Contributions commence on the project's commercial operation date, as defined in the CBF Regulations, and are payable annually on the anniversary of the commercial operation date. Developers may make advance contributions at their discretion, subject to reconciliation at the year's end.

Fund allocation

The CBF is distributed across four mandatory categories to ensure that benefits are equitably shared and strategically directed. The allocation is as follows:

- Near neighbour payments (wind projects only): a minimum of €1000 annually is allocated to each household within a 1-kilometre radius of the renewable energy project. Additional payments may be made to households within a 1- to 2-kilometre radius, subject to fund availability. These payments recognise the localised impact of renewable energy projects and provide direct compensation to those most affected.
- Sustainable development projects: at least 40% of the fund must be allocated to not-for-profit community enterprises focusing on initiatives aligned with the United Nations Sustainable Development Goals (SDGs). Priority areas include:
 - affordable and clean energy (SDG 7);
 - sustainable cities and communities (SDG 11);
 - quality education (SDG 4);
 - climate action (SDG 13).
- Local community initiatives: the remaining balance of the fund, after allocations for near neighbour payments and administration, is made available to support local clubs, societies and other not-for-profit entities. Eligible initiatives must demonstrate a clear benefit to the local community and align with the fund's strategic objectives.
- Administration costs: a maximum of 10% of the fund may be allocated to cover administration expenses. This includes costs related to fund governance, application processing and compliance reporting. Developers may supplement these costs using their own resources, but no additional charges may be levied on the fund.

Governance and oversight

The fund operates under a robust governance framework to ensure compliance with the CBF Regulations. Key governance parameters include the following:

- Fund Committee decision-making: the Fund Committee is responsible for approving funding applications and setting strategic priorities. It must

operate within the mandatory allocation thresholds outlined above.

- Transparency requirements: all funding allocations, applications and decisions must be documented and submitted annually to the EPSS for review. A public register of funded projects will be maintained to ensure transparency and promote knowledge sharing.
- Audit and compliance: the EPSS retains the right to audit any fund to ensure adherence to the CBF Regulations. Developers are required to maintain detailed records and submit annual compliance reports.

Duration and legacy

The CBF is operational for the duration of the renewable energy project's support period, typically 15 years. Developers and Fund Committees are encouraged to adopt strategies that ensure long-term benefits, including the potential establishment of endowment funds or multi-year funding commitments for significant projects. Unused funds may be carried forward to subsequent years with approval from the EPSS. By adhering to these key parameters, the CBF ensures that local communities are empowered to shape their future, fostering resilience, inclusivity and sustainable growth.

A3.3.4 Operation of the fund

The operation of the CBF is governed by principles of transparency, accountability and community engagement. This section outlines the key processes and responsibilities for the establishment, management and disbursement of the fund, ensuring compliance with the CBF Regulations.

Pre-setup – community engagement

The foundation for the successful operation of the CBF begins with early and meaningful engagement between the developer and the local community. Prior to the fund's formal establishment, developers are required to:

- raise awareness by informing local residents, organisations and stakeholders about the establishment of the CBF, its purpose and the opportunities it presents;

- seek community input by consulting with community members to identify priorities and areas of need that the fund should address, ensuring alignment with local aspirations;
- promote participation by publicising opportunities to join the Fund Committee through local media, community meetings and online platforms.

This initial engagement fosters transparency, builds trust and ensures that the fund reflects the community's needs and aspirations.

Establishing the Fund Committee

The Fund Committee is the decision-making body responsible for overseeing the allocation of the CBF. Its establishment is facilitated by the developer or the appointed administrator and must adhere to the following principles:

- Composition: the committee must include representatives from the community, the developer and the administrator. A balance of age, gender, profession and geographical representation is encouraged to reflect the diversity of the local population.
- Selection process: members are selected through an open and transparent process. Public calls for volunteers are supplemented by consultations with local organisations to ensure broad representation.
- Governance standards: members must commit to a code of conduct and conflict of interest policy, ensuring that decisions are impartial and in the best interest of the community.
- Size and term limits: the committee typically comprises 5–14 members, with term limits to allow for periodic rotation and fresh perspectives.

Developing a funding strategy

Once established, the Fund Committee is tasked with creating a funding strategy that outlines the fund's priorities, goals and application criteria. This strategy should:

- align with SDGs by prioritising projects that contribute to the United Nations SDGs, particularly SDGs 4, 7, 11 and 13;

- address local needs by incorporating insights gathered during pre-setup community consultations;
- encourage innovation by including provisions for large-scale, transformative projects with long-term impacts, as well as smaller, community-driven initiatives.

The funding strategy serves as a roadmap for the committee's decision-making and ensures that the fund delivers maximum benefit to the local community.

Application process

The fund operates an annual application cycle that is managed by the administrator in collaboration with the Fund Committee. Key steps in the process include:

- Call for applications: the availability of funding and application criteria should be widely publicised through local and online channels.
- Application submission: applicants must submit detailed proposals, including objectives, implementation timelines, budgets and supporting documents such as proof of community involvement and alignment with the funding strategy.
- Evaluation: the Fund Committee assesses applications based on criteria such as proximity to the renewable energy project, alignment with the SDGs, feasibility and potential impact.
- Funding decisions: approved projects are announced and funding agreements are issued, specifying reporting and accountability requirements.

Disbursement of funds

Funds are disbursed in accordance with the decisions of the Fund Committee. Payments are typically structured as:

- upfront payments, although, for smaller projects, partial upfront payments may be provided, with the balance paid on completion;
- milestone payments, with payments for larger or multi-year projects being made in instalments tied to the achievement of predefined milestones.

All disbursements are subject to the administrator's verification of compliance with funding agreements.

Oversight and reporting

The ongoing operation of the fund is subject to robust oversight to ensure accountability and transparency. Key measures include:

- Annual reports: the developer, in collaboration with the administrator, submits an annual report to the EPSS, detailing fund allocations, project outcomes and remaining balances.
- A public register: the EPSS maintains a public register of funded projects, enabling community members to track the fund's impact.
- Audits: the EPSS conducts periodic audits to verify compliance with the CBF Regulations and assess the fund's effectiveness.

Dispute resolution

In the event of disputes, the following process applies:

- Internal resolution: the Fund Committee, with the support of the administrator, attempts to resolve disputes through discussion and reference to the CBF Regulations.
- Oversight authority support: if internal resolution is unsuccessful, the matter is escalated to the EPSS for mediation.
- Ministerial review: as a final step, unresolved disputes may be referred to the minister responsible for renewable energy, whose decision is binding.

By adhering to these operational guidelines, the CBF ensures the efficient, equitable and transparent distribution of resources, fostering sustainable development and community empowerment.

A3.3.5 Application process

The application process for the CBF is designed to be open, fair and transparent, ensuring that all eligible individuals and organisations have equal opportunity to access funding. This section outlines the step-by-step process for applying to the fund, including eligibility criteria, submission requirements and evaluation procedures. The process is governed by the CBF Regulations and is overseen by the Fund Committee in collaboration with the appointed administrator.

Who can apply?

The fund is open to a wide range of applicants, provided that they meet the eligibility requirements set forth in the CBF Regulations:

- Not-for-profit organisations: community and voluntary groups, charities, social enterprises, clubs and societies are the primary target for funding. These organisations must demonstrate a clear community benefit and alignment with the fund's objectives.
- Individuals: in certain cases, individuals may apply for funding, particularly for projects with demonstrable long-term community impact, such as scholarship initiatives, artistic contributions or environmental restoration projects.
- Geographical proximity: priority is given to projects and applicants located within a 10-kilometre radius of the renewable energy project.

Applicants must provide evidence of their eligibility, including documentation such as proof of not-for-profit status (for organisations) or a connection to the local community (for individuals).

What types of projects are funded?

The CBF supports a diverse range of projects that align with its objectives and priorities, including:

- initiatives that contribute to the United Nations SDGs, particularly SDGs 4 (quality education), 7 (affordable and clean energy), 11 (sustainable cities and communities) and 13 (climate action);
- projects that address community needs such as energy efficiency upgrades, social inclusion initiatives, educational programmes, cultural preservation or recreational activities;
- innovative or large-scale projects with long-term impact, such as community energy systems or infrastructure development.

The fund does not support:

- activities promoting political or religious agendas;
- projects that directly replace statutory funding;
- retrospective funding for activities already completed.

How to apply

The application process consists of the following steps:

- Call for applications: the Fund Committee, in collaboration with the administrator, issues an annual call for applications. This is widely publicised through local media, community networks and online platforms to ensure maximum reach.
- Submission of proposals: applicants must complete a standardised application form provided by the administrator. The form requires detailed information, including:
 - a project description comprising objectives, target beneficiaries and expected outcomes;
 - an implementation plan comprising a step-by-step timeline outlining key activities and milestones;
 - a budget breakdown, that is, a comprehensive financial plan, including cost estimates and supporting quotations where applicable;
 - supporting documentation, that is, evidence of eligibility, community support letters and any relevant permits or approvals.
- Submission deadline: all applications must be submitted by the published deadline. Late submissions are not accepted, except in exceptional circumstances approved by the Fund Committee.
- Acknowledgement of receipt: the administrator confirms receipt of each application and provides applicants with an estimated timeline for decision-making.

Evaluation process

The Fund Committee is responsible for evaluating applications in accordance with the fund's governance framework and the following criteria:

- Alignment with fund objectives: priority is given to projects that address local needs, align with the SDGs and demonstrate clear community benefits.
- Feasibility: applications are assessed for practicality, with realistic timelines, achievable goals and sound financial planning.
- Impact: projects with long-term benefits or significant positive impacts on the community receive higher scores.

- Community engagement: proposals that involve collaboration with local stakeholders or organisations are strongly favoured.
- Proximity: projects located closest to the renewable energy project are prioritised, in line with the fund's mandate.

Each application is scored using a standardised evaluation matrix, with extra weighting for projects focusing on energy efficiency, climate action and social inclusion.

Funding decisions

Once evaluations are complete, the following actions are taken:

- The Fund Committee meets to review scores and make funding decisions.
- Successful applicants are notified in writing, and a funding agreement is issued. This agreement specifies the approved budget, payment schedule, reporting requirements and compliance obligations.
- Unsuccessful applicants receive feedback, providing transparency and guidance for future applications.

Payment of funds

Approved projects receive funds as per the terms outlined in the funding agreement:

- Small projects may receive partial or full upfront payment, subject to verification of eligibility and documentation.

- Large or multi-year projects receive payments that are disbursed in instalments tied to specific milestones or deliverables.

All payments are made via electronic transfer to ensure traceability and accountability.

Reporting and accountability

Recipients are required to submit periodic progress reports and a final project report on completion. These reports must include:

- a summary of activities undertaken;
- evidence of outcomes achieved (e.g. photographs, testimonials, data);
- a financial statement detailing the use of funds.

Failure to comply with reporting requirements may result in the suspension or recovery of funds and could impact future applications.

Appeals and disputes

Applicants who wish to appeal a funding decision must submit a formal request for review within 30 days of notification. The Fund Committee, in consultation with the administrator, will review the appeal and issue a final decision. In cases of unresolved disputes, the matter may be escalated to the EPSS for

Abbreviations

ABICAP	Assessing Administrative Burdens as Barriers to Implementation of Ireland's Climate Action Plan
CBF	Community Benefit Fund
CBF Regulations	Community Benefit Fund Regulations 2025
DAFM	Department of Agriculture, Food and the Marine
EV	Electric vehicle
NCAP	National climate action plan
NGBS	National Governing Bodies of Sport
NSW	New South Wales
PV	Photovoltaic
SDG	Sustainable Development Goal
SEAI	Sustainable Energy Authority of Ireland
WP	Work package

An Ghníomhaireacht Um Chaomhnú Comhshaoil

Tá an GCC freagrach as an gcomhshaol a chosaint agus a fheabhsú, mar shócmhainn luachmhar do mhuintir na hÉireann. Táimid tiomanta do dhaoine agus don chomhshaol a chosaint ar thionchar díobhálach na radaíochta agus an truaillithe.

Is féidir obair na Gníomhaireachta a roinnt ina trí phríomhréimse:

Rialáil: Rialáil agus córais chomhlíonta comhshaoil éifeachtacha a chur i bhfeidhm, chun dea-thorthaí comhshaoil a bhaint amach agus díriú orthu siúd nach mbíonn ag cloí leo.

Eolas: Sonraí, eolas agus measúnú ardchaighdeán, spriocdhírthe agus tráthúil a chur ar fáil i leith an chomhshaoil chun bonn eolais a chur faoin gcinnteoireacht.

Abhcóideacht: Ag obair le daoine eile ar son timpeallachta glaine, táirgiúla agus dea-chosanta agus ar son cleachtas inbhuanaithe i dtaobh an chomhshaoil.

I measc ár gcuid freagrachtaí tá:

Ceadúnú

- > Gníomhaíochtaí tionscail, dramhaíola agus stórála peitрил ar scála mór;
- > Sceitheadh fuíolluisce uirbigh;
- > Úsáid shrianta agus scaoileadh rialaithe Orgánach Géinmhodhnaithe;
- > Foinsí radaíochta ianúcháin;
- > Astaíochtaí gás ceaptha teasa ó thionscal agus ón eitlíocht trí Scéim an AE um Thrádáil Astaíochtaí.

Forfheidhmiú Náisiúnta i leith Cúrsaí Comhshaoil

- > Iniúchadh agus cigireacht ar shaoráidí a bhfuil ceadúnas acu ón GCC;
- > Cur i bhfeidhm an dea-chleachtais a stiúradh i ngníomhaíochtaí agus i saoráidí rialáilte;
- > Maoirseacht a dhéanamh ar fhreagrachtaí an údaráis áitiúil as cosaint an chomhshaoil;
- > Caighdeán an uisce óil phoiblí a rialáil agus údaruithe um sceitheadh fuíolluisce uirbigh a fhorfheidhmiú
- > Caighdeán an uisce óil phoiblí agus phríobháidigh a mheasúnú agus tuairisciú air;
- > Comhordú a dhéanamh ar líonra d'eagraíochtaí seirbhíse poiblí chun tacú le gníomhú i gcoinne coireachta comhshaoil;
- > An dlí a chur orthu siúd a bhriseann dlí an chomhshaoil agus a dhéanann dochar don chomhshaol.

Bainistíocht Dramhaíola agus Ceimiceáin sa Chomhshaol

- > Rialacháin dramhaíola a chur i bhfeidhm agus a fhorfheidhmiú lena n-áirítear saincheisteanna forfheidhmithe náisiúnta;
- > Staitisticí dramhaíola náisiúnta a ullmhú agus a fhoilsiú chomh maith leis an bPlean Náisiúnta um Bainistíocht Dramhaíola Guaisí;
- > An Clár Náisiúnta um Chosc Dramhaíola a fhorbairt agus a chur i bhfeidhm;
- > Reachtaíocht ar rialú ceimiceán sa timpeallacht a chur i bhfeidhm agus tuairisciú ar an reachtaíocht sin.

Bainistíocht Uisce

- > Plé le struchtúir náisiúnta agus réigiúnacha rialachais agus oibriúcháin chun an Chreat-treoir Uisce a chur i bhfeidhm;
- > Monatóireacht, measúnú agus tuairisciú a dhéanamh ar chaighdeán aibhneacha, lochanna, uiscí idirchreasa agus cósta, uiscí snámha agus screamhuisce chomh maith le tomhas ar leibhéil uisce agus sreabhadh abhann.

Eolaíocht Aeráide & Athrú Aeráide

- > Fardail agus réamh-mheastacháin a fhoilsiú um astaíochtaí gás ceaptha teasa na hÉireann;
- > Rúnaíocht a chur ar fáil don Chomhairle Chomhairleach ar Athrú Aeráide agus tacaíocht a thabhairt don Idirphlé Náisiúnta ar Gníomhú ar son na hAeráide;

- > Tacú le gníomhaíochtaí forbartha Náisiúnta, AE agus NA um Eolaíocht agus Beartas Aeráide.

Monatóireacht & Measúnú ar an gComhshaol

- > Córais náisiúnta um monatóireacht an chomhshaoil a cheapadh agus a chur i bhfeidhm: teicneolaíocht, bainistíocht sonraí, anailís agus réamhaisnéisiú;
- > Tuairiscí ar Staid Thimpeallacht na hÉireann agus ar Tháscairí a chur ar fáil;
- > Monatóireacht a dhéanamh ar chaighdeán an aeir agus Treoir an AE i leith Aeir Ghlain don Eoraip a chur i bhfeidhm chomh maith leis an gCoinbhinsiún ar Aerthruailliú Fadraoin Trasteorann, agus an Treoir i leith na Teorann Náisiúnta Astaíochtaí;
- > Maoirseacht a dhéanamh ar chur i bhfeidhm na Treorach i leith Torainn Timpeallachta;
- > Measúnú a dhéanamh ar thionchar pleananna agus clár beartaithe ar chomhshaol na hÉireann.

Taighde agus Forbairt Comhshaoil

- > Comhordú a dhéanamh ar ghníomhaíochtaí taighde comhshaoil agus iad a mhaoiniú chun brú a aithint, bonn eolais a chur faoin mbeartas agus réitigh a chur ar fáil;
- > Comhoibriú le gníomhaíocht náisiúnta agus AE um thaighde comhshaoil.

Cosaint Raideolaíoch

- > Monatóireacht a dhéanamh ar leibhéil radaíochta agus nochtadh an phobail do radaíocht ianúcháin agus do réimsí leictreamaighnéadacha a mheas;
- > Cabhrú le pleananna náisiúnta a fhorbairt le haghaidh éigeandálaí ag eascairt as tasmí núicléacha;
- > Monatóireacht a dhéanamh ar fhorbairtí thar lear a bhaineann le saoráidí núicléacha agus leis an tsábháilteacht raideolaíochta;
- > Sainseirbhísí um chosaint ar an radaíocht a sholáthar, nó maoirsiú a dhéanamh ar sholáthar na seirbhísí sin.

Treoir, Ardú Feasachta agus Faisnéis Inrochtana

- > Tuairisciú, comhairle agus treoir neamhspleách, fianaise-bhunaithe a chur ar fáil don Rialtas, don tionscal agus don phobal ar ábhair maidir le cosaint comhshaoil agus raideolaíoch;
- > An nasc idir sláinte agus folláine, an geilleagar agus timpeallacht ghlan a chur chun cinn;
- > Feasacht comhshaoil a chur chun cinn lena n-áirítear tacú le hiompraíocht um éifeachtúlacht acmhainní agus aistriú aeráide;
- > Tástáil radóin a chur chun cinn i dtithe agus in ionaid oibre agus feabhsúchán a mholadh áit is gá.

Comhpháirtíocht agus Líonrú

- > Oibriú le gníomhaireachtaí idirnáisiúnta agus náisiúnta, údaráis réigiúnacha agus áitiúla, eagraíochtaí neamhrialtais, comhlachtaí ionadaíocha agus ranna rialtais chun cosaint comhshaoil agus raideolaíoch a chur ar fáil, chomh maith le taighde, comhordú agus cinnteoireacht bunaithe ar an eolaíocht.

Bainistíocht agus struchtúr na Gníomhaireachta um Chaomhnú Comhshaoil

Tá an GCC á bainistiú ag Bord lánaimseartha, ar a bhfuil Ard-Stiúrthóir agus cúigear Stiúrthóir. Déantar an obair ar fud cúig cinn d'Oifigí:

1. An Oifig um Inbhuanaitheacht i leith Cúrsaí Comhshaoil
2. An Oifig Forfheidhmithe i leith Cúrsaí Comhshaoil
3. An Oifig um Fhianaise agus Measúnú
4. An Oifig um Chosaint ar Radaíocht agus Monatóireacht Comhshaoil
5. An Oifig Cumarsáide agus Seirbhísí Corparáideacha

Tugann coistí comhairleacha cabhair don Ghníomhaireacht agus tagann siad le chéile go rialta le plé a dhéanamh ar ábhair imní agus le comhairle a chur ar an mBord.

EPA Research

Webpages: www.epa.ie/our-services/research/

LinkedIn: www.linkedin.com/showcase/eparesearch/

Twitter: @EPAResearchNews

Email: research@epa.ie

www.epa.ie