



**Joint Oireachtas Committee on Climate, Environment and Energy
General Scheme of the Strategic Gas Emergency Reserve Bill 2025**

Friends of the Earth Opening Statement to the Pre-Legislative Scrutiny

5 February 2026

Deirdre Duffy and Jerry Mac Evilly

Opening

Thank you Chair and Committee members for the invitation to present today.

Friends of the Earth campaigns for a healthy, pollution-free world and for a fair and fast transition away from fossil fuels. We have consistently called for Ireland to shift its energy system away from fossil fuels as quickly as possible and to avoid locking future generations into fossil-gas dependence.

At the outset we note for the Committee the affected local communities in the vicinity of the proposed LNG site and recommend all steps are taken to ensure meaningful dialogue with them at all times by Government and legislators.

We recognise that security of energy supply is a legitimate and important public interest, particularly in a time of geopolitical instability and infrastructure vulnerability. However, it is our view that the approach set out in this Scheme is not the answer.

Energy security that weakens climate law and democratic safeguards, as this Scheme does, is not security, it is a liability.

At a time when democratic norms are under strain, it is deeply concerning that this Scheme sidelines democratic legitimacy by concentrating ministerial power and bypassing established planning processes essential to public trust.

Let me be clear at the outset. Friends of the Earth does not believe an LNG terminal, state-owned or commercial, is an appropriate, sustainable or effective solution to Ireland's energy security or national climate objective. Our opening statement will focus on three issues: energy security, climate law and governance, and EU law and emergency framing.

Climate and Energy Security Are Not Competing Goals

A false choice is being constructed between climate responsibility and energy security. The Committee does not face such a choice.

Energy security must be delivered in compliance with climate and environmental law. In 2026, security cannot mean deeper dependence on imported fossil fuels. It must mean resilience. Resilience begets security.

We now live in a world where energy dependence is a strategic weakness. Markets are volatile, infrastructure is exposed, and imported fuel carries geopolitical risk. Accelerating LNG infrastructure does not reduce that risk, it concentrates it, tying Ireland more tightly to global gas markets and long-lived fossil assets whose consequences extend far beyond any short-term emergency.

An electricity-led system based on renewables, demand reduction, storage and interconnection does the opposite. It spreads risk, is harder to disrupt, and is more resilient by design. Strategic autonomy is now central to security. Renewables expand Ireland's choices whereas LNG narrows them.

The gas security context has also changed fundamentally. Ireland already sources most of its gas via Britain, which functions as a regional hub drawing on North Sea gas, Norwegian imports, LNG and continental Europe. Since the invasion of Ukraine, both the EU and UK have become more reliant on US LNG, exposing Europe to new risks, including supply disruption, geopolitical leverage and US domestic political volatility. A floating LNG terminal is not immune to these risks and may be as vulnerable (or more) as existing interconnectors.

Misalignment with Government Policy and Advice

The Scheme conflicts with repeated Parliamentary statements from the Minister supporting only temporary, climate-law-compliant measures that do not increase gas demand. It also runs counter to the Programme for Government commitment to reduce reliance on polluting and expensive fossil fuels.

It appears to disregard the Government's own Energy Security Review, which makes clear that reducing gas consumption and dependency is essential to meeting Ireland's climate obligations. Furthermore, this Scheme directly contradicts advice from the Climate Change Advisory Council, which has warned that LNG risks locking Ireland into long-term fossil fuel dependence and increasing emissions, particularly through upstream methane leakage.

Climate Law Is Not Optional

The Scheme's most serious flaw is its approach to climate governance, particularly Head 20.

First, it elevates gas security of supply as an overriding consideration without requiring proper consideration of climate limits, household energy costs, public health or community safety.

Second, it weakens the Climate Act's consistency obligation by referring to plans and strategies rather than binding carbon budgets, creating a real risk of long-term emissions lock-in even where better alternatives exist.

Third, extending weaker obligations under this Scheme to An Coimisiún Pleanála fragments climate governance, leaving some public bodies bound by climate law while others are effectively exempt.

Fourth and most concerning is the proposal to deem the development compliant with the Climate Act. Compliance cannot be legislated into existence. The Courts are very clear that it must arise from evidence-based assessment. Deeming compliance in advance undermines environmental law, the Aarhus Convention, EU law, and raises serious constitutional concerns around separation of powers and access to justice.

By sidelining established planning safeguards, this approach undermines transparency and accountability. Executive actions in the name of energy security that erode public trust are not secure. Legitimacy and accountability are part of the resilience we need for Ireland's security.

EU Law and Emergency Framing

The Scheme also misapplies Regulation (EU) 2017/1938. The N-1 standard is a resilience metric, not a mandate to build LNG. EU law requires security of supply to be achieved through the least-distortive and most proportionate measures, prioritising demand-side and regional alternatives.

Emergency measures under EU law and the European Convention on Human Rights must be necessary, proportionate and temporary. That test is not met here.

If the Government genuinely viewed N-1 non-compliance as an emergency, it would have prioritised stopping the problem from worsening. Instead, it has facilitated rapid data-centre expansion, now the single largest driver of new gas demand.

N-1 is being treated as a supply problem, when in reality it is driven by unmanaged demand growth. Renewables matching does not resolve this. Data centres remain reliant on gas-fired generation for balancing and backup, shifting security risks onto the gas network. Gas Network Ireland's own projections confirm that industrial demand, driven primarily by data centres, is now the main source of sustained gas reliance.

The European Commission is reviewing N-1 because it no longer reflects modern supply-chain risks. Yet the Heads suggest climate law cannot obstruct N-1 compliance. However, EU energy security law does not override EU climate law, the State must comply with both.

This Scheme poses a serious risk that an LNG facility funded by all consumers will function as an insurance policy for high-demand industrial users rather than a genuine emergency reserve.

Committee Responsibility and Conclusion

These risks arise directly from bypassing the ordinary planning system without equivalent safeguards.

If unaddressed, the Oireachtas risks enacting legislation that is foreseeably incompatible with EU law and human-rights obligations, exposing the State and the taxpayer to avoidable legal challenges.

The Committee has a critical role at this stage. This is the point in the process where these defects can, and must be addressed.

We therefore urge the Committee to recommend that the Government not proceed with this Bill. Instead, the Government should undertake an updated energy security assessment that properly considers demand-side measures and the risks of increased LNG dependence.

The choice before the Committee is whether energy security is pursued in a way that strengthens climate law and public trust, or undermines both.

ENDS