Friends of the Earth

Friends of the Earth submission to Department of Climate, Energy and Environment
Consultation on Climate Action Plan 2026
17 August 2026

Question 1

In Ireland's Greenhouse Gas Emissions Projections 2025-2030, the EPA now projects for the first time that we are close to meeting our first carbon budget, following a consistent trend of improving projections for that budget over recent years. In your view, which policies and measures have been the most successful in reducing Ireland's GHG emissions?

Enabling Framework provided for by the Climate Act

- Ireland's climate policy development is anchored in the binding statutory framework established by the Climate Action and Low Carbon Development Act 2015, as amended and developed in 2021. While sectoral policies have driven physical reductions, this legal regime has allowed for cross-governmental accountability and coordination across Departments and public bodies.
- However, following the Supreme Court's Coolglass decision clarifying Section 15 public body consistency obligations, certain elements in Government and Departments have taken a limited view of Section 15 as an impediment to infrastructure delivery. Against **a background of concerns about perceived judicial review risks, this has resulted in the disapplication of s.15 from the Critical Infrastructure Bill, Strategic Gas Reserve Bill and the Dublin Airport Passenger Cap Bill. The information and analysis available to us strongly indicate that legislative disapplication in order to expedite development is strategically misguided, legally dubious and counterproductive. We would welcome direct engagement with the Minister and Department to address these concerns and to identify how the existing statutory framework can be applied to support, rather than impede, the delivery of essential infrastructure.**
- The interpretation of Section 15 as merely a constraint is not supported by the facts. Disapplication fails to eliminate wider obligations under administrative law, human rights standards, or binding EU climate law (e.g., Effort Sharing Regulation targets). As the Supreme Court clarified in Coolglass, it is a flexible consistency duty. Properly applied, s.15 can facilitate infrastructure as it serves as an analytical tool to distinguish between projects or approaches to develop that increase emissions and those essential to decarbonisation and energy security. Seeking statutory exemptions signals that state developments cannot withstand climate scrutiny. This

creates reputational damage during Ireland's EU Council Presidency, while unfairly shifting the compliance deficit onto other sectors/industries.

- Reconciling climate obligations with infrastructure delivery involves legitimate, complex trade-offs. The solution lies in stronger policy integration, better evidence, and transparent decision-making, not weakening the statutory framework designed to ensure Ireland's infrastructure investment accelerates, rather than undermines, a pathway to a zero-carbon economy. **We are concerned that, notwithstanding clear Programme for Government commitments, this approach is not yet being systematically championed by the Minister and Department.**

Emissions Trajectory and Weaknesses

We have concerns with the framing of the question. While emissions have reduced and carbon budget 1 may be achieved, this is subject to several major caveats as outlined below. It is concerning that such issues are not referenced or alluded to.

- Ireland's emissions trajectory is projected to deteriorate over the course of this Government's term unless substantive new additional measures are incorporated into the next Climate Action Plan. The EPA has noted that performance across individual sectors varied significantly. Substantive decreases between 3% and 7% were observed in energy, buildings, commercial/public, and industry, with residential emissions falling by 5% to their lowest level since 1990. Conversely, transport, agriculture, and waste saw minor reductions under 2%. Notably, transport and industry exceeded their respective sectoral emission limits by 8% and 9% respectively, direct comparisons for agriculture were prevented by historical baseline recalibrations, while electricity exceeded its ceiling by 0.3%.[1]
- And the EPA have highlighted that, despite these reductions, Ireland remains significantly off course from meeting its long-term national and international climate commitments. To achieve the national target of a 51% emissions reduction by 2030 compared to 2018 levels, annual decreases of over 10% are required, however, current policy projections based on all additional measures implemented indicate a total reduction of only 25% by 2030. The main sectors are expected to exceed their emissions limits through 2030, likely causing the country to miss its second carbon budget. Furthermore, progress toward our main EU ESR climate target, which mandates a 42% reduction by 2030 compared to 2005, stands at just 12% as of 2025, with projections suggesting Ireland will deliver at best a 23% reduction. [2]
- This is the central context for the production of the forthcoming Climate Action Plan and policy must be comprehensively and urgently strengthened across sectors in response to high emission projections
- The Department of Taoiseach Q1 & Q2 Progress Report on Legacy Actions indicates that implementation of the Climate Action Plan has fallen behind, with 64 out of 74 legacy actions from CAP 23, 24, and 25 facing delays. The subsequent Climate Action Plans should outline how planned measures will lower emissions to meet updated carbon budgets, providing both clear quantifications and detailed explanations. Without quantifying expected emission drops from planned measures

[1] https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-Provisional-GHG-Emissions-1990-2025-web.pdf
[2] https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2025-2030-Web.pdf

and mapping out a clear implementation path, it is not possible to properly model if a climate action plan will achieve or has achieved its intended reductions. This is also evident from the EPA's statement that specific policies and measures were omitted from Ireland's Greenhouse Gas Emissions Projections in May 2026 due to a lack of evidence regarding an implementation pathway.

- It is important to note that a substantive portion of the emissions reductions during the first Carbon Budget period were a result of changes in emission accounting and external factors, such as the effects of the COVID-19 pandemic, warmer winters, and the Ukraine war, rather than being driven by actions taken under Government policy. Significant revisions to Ireland's national greenhouse gas inventory have also altered the emissions baseline against which progress is assessed. In particular, the Climate Change Advisory Council reports that revisions incorporated into the 2025 inventory reduced estimated 2018 agriculture emissions by 6.8% and LULUCF net emissions by 16.7%, relative to the 2021 inventory that informed the initial carbon-budget calculations. These changes reflect updated research, methodologies and data rather than reductions in physical emissions. However, the carbon budgets and Agriculture sectoral emissions ceiling have not yet been recalibrated to reflect these inventory revisions. As the CCAC has emphasised, inventory revisions can make compliance with existing carbon budgets and sectoral ceilings easier without reflecting equivalent progress towards decarbonisation. Consequently, the Council has recommended a reassessment. The CCAC has underlined that "Such significant revisions to the inventory need to be addressed proactively to ensure that carbon budgets, and associated sectoral emissions ceilings, remain relevant and aligned with the National Climate Objective. Reductions in estimates of emissions will make both the national carbon budgets and impacted sectoral ceilings easier to comply with and vice versa but do not reflect actual progress towards decarbonisation of Ireland's economy, which is what matters from a climate system perspective. Not updating carbon budgets and sectoral ceilings may well lead to perverse socio-economic outcomes."[3]

Policy Measures

In evaluating the efficacy of Ireland's climate policies, it is essential to distinguish between near-term reductions in reported emissions and structural emission avoidance (preventative measures that constrain fossil-fuel demand and infrastructure lock-in). Ireland's continued decarbonisation of electricity generation is evidently significant and welcome. This progress has been driven primarily by higher renewable integration, increased interconnector capacity, and the displacement of coal. However, the importance of preventative policy interventions is understated in accounting metrics. By constraining fossil-fuel supply, managing demand growth, and removing regulatory friction for zero-carbon assets, these measures avoided substantial cumulative emissions over the lifetime of infrastructure and assets. Operational efficiency gains and renewable deployment are necessary, but their success depends on preventative supply- and demand-side measures. Without managing large-scale new demand growth and blocking long-lived infrastructure lock-in, new renewable generation risks meeting additional demand rather than displacing fossil-fuel

[3] CCAC, *Annual Review 2024: Cross Sectoral Review* https://www.climatecouncil.ie/councilpublications/annualreviewandreport/AR2024-Cross-sectoral-Review-FINAL.pdf

consumption. This is particularly important given that gas still accounted for 41.8% of electricity generation in 2024. The Department's policy priorities should focus on addressing these structural measures while expanding public access to renewables and energy efficiency.

- The Commission for Regulation of Utilities (CRU) direction in late 2021, which established an effective freeze on new data-centre grid connections in the Dublin region, represents one of Ireland's most structural demand-side climate interventions. The core value of connection restrictions was not merely preventing physical structures from being built; it was preventing electricity demand from expanding ahead of the capacity of the low-carbon electricity system to meet it. Because gas remains a major source of generation on the Irish grid, adding unconstrained, inflexible large-scale demand can increase pressure for additional thermal generation, grid reinforcement and system-support capacity. The importance of this intervention is underscored by the fact that data centres accounted for around 22% of national electricity consumption in 2024. The subsequent easing of these restrictions through the CRU's Large Energy Users (LEU) connection policy risks reversing this progress. Ireland should maintain a moratorium on new data-centre grid connections until electricity demand growth is demonstrably aligned with the pace of renewable generation, grid reinforcement and system flexibility. Data centres are already a very large and rapidly growing electricity load; allowing further unconstrained expansion risks absorbing new renewable generation that would otherwise displace fossil-fuels and increasing reliance on gas-fired generation and grid balancing. A continued moratorium is justified not simply as a grid-capacity measure, but as a climate measure. Ireland should prioritise decarbonising existing electricity demand before permitting large new sources of predominantly inflexible demand. We would underline that current policy does support existing fossil fuel phase out objectives and demand reduction requirements, as detailed in Annex 1.
- The 2021 Government Policy Statement on Fracked Gas established a moratorium on the development of commercial LNG import terminals pending the completion of a comprehensive energy security review. Preventing the construction of commercial LNG terminals in Ireland reduced the risk of a fossil-fuel lock-in dynamic, wherein substantial capital investment creates a long-term commercial incentive to maintain natural gas throughput to amortise assets. However this moratorium was removed to provide for the Government's decision in favour of a state-led FSRU. Even State-owned infrastructure risks creating long-lived fossil-fuel infrastructure and institutional incentives for continued gas use, potentially diverting capital from long-duration energy storage, interconnection, demand flexibility, grid reinforcement and further renewable deployment. We remain of the view that risks to communities in south Clare, as well as climate obligations and the increasing volatility of gas costs (as evidenced by gas crisis following the attacks on Iran and blockage of the Strait of Hormuz) strengthen the case for minimising Ireland's exposure to imported gas, in favour of long-term battery storage, greater electricity interconnection, system flexibility, further expansion of renewables and solar. We are concerned that Government has appeared to reverse commitments in the 2023 Energy Security Review to codify clear safeguards ensuring that any State-reserved strategic gas capacity is strictly limited to genuine emergency use, is non-commercial in operation, and is aligned with carbon budgets.

- Ireland's onshore ban on hydraulic fracturing (Petroleum and Other Minerals Development (Prohibition of Onshore Hydraulic Fracturing) Act 2017) and the subsequent policy opposing fracked gas imports address the supply-side dynamics of climate policy. The Act makes it unlawful to search for or extract onshore petroleum using hydraulic fracturing. By closing off fracked gas, Ireland removed the prospect of establishing a domestic shale-gas industry and, more importantly, established a clear policy direction away from new fossil-fuel extraction. The principal climate benefit is therefore preventative: avoiding the infrastructure, investment and political-economic incentives that accompany a new domestic fossil-fuel industry.
- The formal commitment to cease granting new oil and gas exploration licences serves as an important strategic market-signalling mechanism. Allowing ongoing exploration while simultaneously mandating household electrification creates policy incoherence. Ceasing new exploration licenses provided clarity to institutional investors: Ireland's long-term energy transition favors renewable generation, energy storage, and grid modernisation rather than new domestic fossil resource extraction. However the ban applies to new exploration licences, rather than extinguishing all existing authorisations. Existing licences and authorisations granted before the policy can therefore remain active, subject to their terms and applicable regulatory requirements. Preserving legacy exploration channels can weaken the clarity of the State's long-term decarbonisation signal and creates a risk of stranded assets if development proceeds late in the transition. The Department should consider a clear statutory framework governing the non-renewal of legacy exploration rights at expiry, alongside a structured approach to the phase-out of remaining active offshore authorisations where appropriate.
- The 2022 planning regulations reform, which removed the requirement for planning permission for rooftop solar PV across residential dwellings, agricultural buildings, commercial structures, and schools, eliminated a key barrier to distributed renewable deployment. By transitioning rooftop solar from an administratively conditional project to a permitted development, Ireland substantially reduced the friction associated with household and small-scale renewable investment. Despite this progress, the current solar PV deployment model risks creating a two-tier energy transition. Tenants in private rented accommodations and occupants of multi-unit residential developments (apartments) remain largely locked out due to split-incentive problems between landlords and tenants. High initial capital requirements, even when partially offset by SEAI grants, leave lower-income households unable to participate, concentrating the bill-reduction and carbon-reduction benefits among higher-income property owners. Future policy should therefore focus on extending access to solar beyond owner-occupied houses, particularly through social housing, apartments, rented accommodation and community energy models.
- The roll-out of the Microgeneration Support Scheme (MSS) and the Clean Export Guarantee (CEG) established the market structure required for distributed solar adoption. Before the CEG framework, surplus residential electricity was exported to the grid without an established, consistent remuneration mechanism. The CEG provided a framework for suppliers to remunerate eligible microgenerators for exported renewable electricity, while the tax treatment of microgeneration export income further improved the economics of household generation. The combination of regulatory streamlining (planning exemption), capital risk reduction (SEAI grants), and revenue certainty (CEG export tariffs) successfully transformed home solar

installations from passive consumer items into productive distributed energy assets, reducing grid electricity demand and displacing fossil-fuel generation at the margin. The current scale of deployment suggests that this combination of measures has been one of the more successful examples of policy-enabled decarbonisation.

Question 2

Among the measures identified in Climate Action Plan 2024 and Climate Action Plan 2025, which do you consider the highest priority to close the gap to 2030?

- It is important that the Department prioritises measures which have not only reduced emissions but also increased resilience and improved quality of life. In particular, in recent years, successive Governments have reduced fossil-fuel heating reliance and electricity among vulnerable households through the SEAI Warmer Homes Scheme and the Social Housing Energy Efficiency Retrofit Programme, guided by the national Energy Poverty Action Plan. Equally SEAI grant enhancements and dedicated solar PV supports for medically vulnerable households have further mitigated energy costs, protecting those dependent on life-supporting electrical equipment from price volatility. The issue is not merely that increased investment in such schemes provides tangible climate benefits. The point is that targeting such measures at poor quality housing, as well as vulnerable and marginalised communities decreases exposure to fossil fuel volatility and can provide substantive wellbeing benefits. See further on these issues in subsequent sections.

- As noted above, successful climate policies are not simply those that reduce the emissions intensity of existing energy consumption; they are also those that prevent additional fossil-fuel demand from being created, support fossil fuel phase out, and ensure that renewable deployment results in actual fossil-fuel displacement. Previous Climate Action Plans provide a strong policy basis for going beyond incremental emissions reductions and addressing the underlying drivers of fossil-fuel dependence. See Annex 1

- CAP25 recognised that the measures currently in place are insufficient to meet carbon budget obligations.[4] Therefore, policies which prevent additional fossil-fuel demand and infrastructure lock-in require greater focus (see below). CAP25 explicitly attributes the 22% electricity-sector emissions reduction between 2021 and 2023 to increased renewables and reduced domestic fossil generation. [5] **It is important that CAP26 again recognises that renewable deployment alone is not enough. Indeed CAP24 acknowledged that renewable deployment alone cannot deliver the required emissions reductions in the face of projected electricity-demand growth; that renewable deployment must outpace demand growth; that**

[4] *"The 2023–2050 EPA Projections Report indicates that while annual emissions are reducing for the first carbon budget period, mitigation will be insufficient."*

[5] "The 22% reduction in emissions in the electricity sector is due to an increase in the share of renewable electricity generation... and... a reduction in the use of coal-, oil-, and gas-fired plant for domestic generation".

demand must be calibrated with renewable supply; and that fossil-fuel demand from large energy users may need to be subject to mandated caps.[6] CAP24 and 25 also set 7% and 10% reductions in industrial fossil-fuel demand through energy efficiency by 2025 and 2030 respectively, alongside a much larger reduction in the overall share of fossil fuels in industrial final consumption.

- CAP26 must transparently address major weaknesses in current policy relating to data centres (see also further recommendations in subsequent sections). While the CRU has introduced an 80% renewables requirement for new data centres after 6 years for new LEU connections, recent UCC research has highlighted that this carries major adverse impacts for energy security and compliance with national and EU climate and energy obligations. [7]

- SEAI's National Energy Projections in both 2024 and 2025 also warn that, where electricity demand grows faster than renewable deployment, renewables risk merely abating further increases in emissions rather than delivering the absolute reductions required. Both reports distinguish data-centre demand from beneficial electrification of heat and transport: unlike those forms of electrification, new data-centre demand does not displace fossil-fuel use elsewhere and therefore risks increasing emissions and undermining Ireland's climate and renewable-energy targets.[8] These are set out in full in Annex 1.

- The next Climate Action Plan should therefore act on this established warning by preventing new data-centre demand from creating additional fossil-fuel dependence and ensuring that renewable deployment and system flexibility demonstrably outpace new demand, so that **renewable generation delivers genuine fossil-fuel displacement rather than simply accommodating additional consumption.** Given that Government and the Department have already recognised the legitimacy of putting limitations on additional fossil-fuel demand from large energy users, **CAP26 must go beyond the CRU's LEU connection policy and address the need for a pause on new data-centre development until demand growth is**

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[6] *"The deployment of renewables needs to outpace the growth in energy demand for it to deliver the absolute reductions in GHG emissions required. Therefore, the timing of the delivery of the renewable energy generation relative to the scale and pace of growth in electricity demand is a critical factor."* p.161
"Notwithstanding the above, the scale of projected electricity demand growth means that the delivery and integration of the renewables programme alone does not deliver required levels of emissions reduction. Net Zero demand growth and calibrating renewable energy with demand will need to be pursued as a matter of urgency as a part of a longer-term decarbonisation pathway for the sector including for the third carbon budge" p.163
"Achieving further emissions reductions between now and 2030 requires a major step up across three key measures: ` Accelerate and increase the deployment of renewable energy to replace fossil fuels; ` Deliver a flexible system to support renewables and demand; ` Manage demand." p.166

[7] Potential impact of the Large Energy User Connection Policy on energy and climate targets Dr. Teresa Bonserio, Prof. Hannah Daly https://www.esri.ie/sites/default/files/media/file-uploads/2026-06/9.Teresa_UCC-ESRI-MaREI%20seminar.pdf

[8] See quotes from SEAI National Energy Projections Report 2024 and 2025 in Annex 1 below
https://www.seai.ie/sites/default/files/publications/National-Energy-Projections-Report-2025.pdf
https://www.seai.ie/sites/default/files/publications/National-Energy-Projections-Report-2024.pdf

demonstrably compatible with Ireland's decarbonisation trajectory.

- CAP24 included a commitment for the Department to assess whether mandated caps on increases in fossil-fuel demand by large energy users could be introduced.[9] We note that the Department has stated that this option would not be progressed at this time as it would be challenging to implement with an impact in the period 2026–2030, given the need for several years' notice, and the difficulty of mandating a cap on operational fossil systems by 2030, particularly in hard-to-decarbonise applications. **However, the projected extreme increases in electricity and gas demand from data centres merit a reconsideration of this option. We would underline that the measure does not need to deliver its full emissions impact by 2030 to contribute meaningfully to carbon budget compliance. A clear trajectory even post 2030 could still give large energy users sufficient time to invest in electrification, efficiency, renewable energy, storage and other alternatives, while avoiding fossil-fuel lock-in**. Given CAP24's explicit recognition that renewable deployment alone will not deliver the required emissions reductions and that fossil-fuel demand must be reduced, the Department should reconsider establishing a clear regulatory pathway now, for example with implementation and progressively tightening caps from 2030 onwards.

- The new Climate Action Plan should take into consideration the risk of new emissions created through proposed Private Wires Bill which is currently at risk of locking in increased fossil fuel use by failing to rule out connections between users who will potentially avail of any new Private Wires legislation, and new fossil fuel generation. Likewise, Private Wires, if not fully aligned with national climate obligations and decarbonisation objectives, risks diverting new renewables away from climate action plan targets and towards new, large energy users. CAP 24 therefore should identify and address risks of future fossil gas lock-in which could be enabled through Private Wires legislation, and establish clear guiding principles that any Private Wire connection must only be permitted when connecting already existing energy users to new and additional renewable sources, outside of those already planned and funded through RESS.

- CAP24 recognised the need for action partly through reductions in fossil-fuel demand itself, not only through improvements in carbon intensity. CAP24 explicitly recognises that Ireland must "significantly and urgently reduce" the use of all fossil fuels.[10] It also expressly recognised the need to reduce gas demand, as well as fugitive methane emissions.[11] **We welcome that Ireland's 2024 Long-term Strategy on**

[9] CAP24 "DECC will assess whether mandated caps on any increase in fossil fuel demand by large energy users could be put in place from 2026."
[10] "To achieve these highly ambitious targets, we must significantly and urgently reduce the use of all fossil fuels (coal, natural gas, oil, and peat) and improve energy efficiency in our buildings."
[11] "Ireland will reduce the fugitive methane emissions which arise from the production and transportation of fossil fuels, especially natural gas, by increasing renewable energy and decreasing the demand for fossil fuels."
"Reduce fossil fuel demand through energy efficiency measures in industry" "Reduce natural gas demand and develop renewable, indigenous gas supply and renewable gas-compatible storage

Greenhouse Gas Emissions Reduction and related policy documents set out a clear expectation that Ireland will reduce its reliance on natural gas by reducing demand. The 2023 Energy Security Package, drawing on MaREI/UCC modelling, also highlighted that although gas demand may vary in the early 2030s depending on electricity demand and renewable capacity, overall demand is projected to fall by 68–78% between 2030 and 2040, indicating a significantly reduced role for natural gas by 2040. This direction is similarly reflected in Ireland's 2024 National Energy and Climate Plan, whose scenarios project declining natural-gas consumption through to 2050. **See Annex 1 which sets out existing fossil fuel phase out commitments in full.**

- Most recently in July 2026, the CRU produced its Price Control Strategy Paper regarding Gas Network Ireland's operations and assets.[12] The CRU identifies a reducing gas demand and customer base as a central feature of the PC6 period, and explicitly proposes measures to prepare GNI for declining gas demand. This issue is also addressed by the IEA in 2021 in its IEA's Net Zero pathway which noted the need for a sharp decline in fossil-gas demand and warned that new large-scale fossil-fuel infrastructure is inconsistent with a 1.5°C pathway.
- **CAP 2026 should therefore set out the need for reductions in fossil gas demand and provide clear targets for reduction particularly in the energy sector. It should note that introduction of any fossil-gas infrastructure particularly LNG risks undermining climate obligations** (see further below). As noted, rather than seeking to ensure consistency with the declining fossil-fuel trajectory required by carbon budgets, Government has disapplied s.15 in the Strategic Gas Reserve Bill. The Department is aware that new LNG infrastructure risks creating additional physical and economic dependence on fossil gas imports that the Climate Action Plans themselves identify as requiring rapid reduction. It is therefore concerning that the Minister and Department did not accept relevant recommendations to address this issue from the PLS report of the Oireachtas Committee on Climate on the Strategic Gas Emergency Reserve Bill. [13]
- In terms of priority measures, it should also be noted that CAP24 identified the combination of planning reform and the ability of households to sell excess electricity back to the grid as part of the progress being made on domestic solar. It established a 2030 target of 8 GW of solar capacity and 1.6 GW for microgeneration capacity. It supported the policy approach of removing regulatory barriers for households. CAP25 reinforced this approach and highlighted that more than 100,000 rooftop microgenerators were connected to Ireland's electricity network by the first half of

solutions. "Reduction of demand due to energy efficiency responses to mitigate reliance on fossil fuels"

[12] https://consult.cru.ie/en/consultation/price-control-6-strategy-paper-1

[13] https://data.oireachtas.ie/ie/oireachtas/committee/dail/34/joint_committee_on_climate_environment_and_energy/reports/2026/2026-02-26_report-on-pre-legislative-scrutiny-of-the-general-scheme-of-the-strategic-gas-emergency-reserve-bill-2025_en.pdf

2024. **We consider these microgeneration targets and measures to be essential to reducing emissions, improving community resilience and energy security and reducing fossil fuel reliance for household customers.** CAP24 and CAP25 support the continued expansion of residential and social-housing retrofit, including fabric and energy-efficiency improvements and the transition away from fossil-fuel heating, with particular attention to energy poverty. Both Plans also supported greater citizen and community participation in renewable energy, including through Renewable Energy Communities and community-led renewable projects, alongside the community participation and benefit mechanisms associated with renewable-energy support schemes such as RESS. These measures are important not only for aggregate emissions reduction but also as they reduce exposure to fossil fuel price volatility, broaden participation in the energy transition, as well as reducing emissions.

Question 3

In the key sectoral areas identified (Electricity, Transport, Industry, Buildings, Agriculture and Land Use), what additional actions to those already in CAP 24 and CAP 25 could, in your view, accelerate delivery in these areas?

Our response focuses on the buildings and electricity sectors. Additionally, we endorse the submissions made by the Environmental Pillar and Stop Climate Chaos, particularly concerning their recommendations for other sectors.

Electricity:

- While successive Climate Action Plans have committed to 80% renewable electricity by 2030, Government efforts have left Ireland falling significantly below the trajectory needed to meet this ambition, with projections indicating a 60-68% reduction[14]. Renewable penetration has effectively flatlined in recent years: across the all-island grid, renewables met 38.4% of demand in 2025, almost unchanged from 37-38% in 2022[15]. This indicates an electricity system structurally unable to meet rapidly rising electricity demand with new renewable generation.

- Total electricity demand has already surpassed 32 TWh annually, and continues to grow year-on-year[16]. Instead of a decisive shift to an electricity system which delivers clean, affordable energy, successive Government decision-making has allowed new demand from data centre developments to grow faster than renewable generation[17], reinforcing continued reliance on gas and exposing households to increasingly volatile prices.

[14] https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/07875-EPA-GHG-Projections-Report-FINAL.pdf
[15] https://currents.greencollective.io/a-year-in-review-the-irish-grid-in-2025
[16] https://www.seai.ie/sites/default/files/publications/Energy-in-Ireland-2025.pdf
[17] https://www.ucc.ie/en/media/research/energypolicyandmodellinggroup/data_centrres_and_the_carbon_budgets_-_prof_hannah_daly_dec_2024.pdf

- Data centres already consume 23% of Ireland's metered electricity, with projections suggesting they could account for up to one-third of demand by 2030[18]. The decision by the Commission for the Regulation of Utilities (CRU) on Large Energy Users[19], estimates the additional medium-term demand from the data centres industry at 5.8GW. In this same decision, the CRU took the position that the Climate Act did not provide a sufficient legal basis for it to explicitly mandate specific emissions-reduction or offsetting measures. We will not address the problematic nature of this position in detail in this submission, however in short we consider it to be at best legally questionable and strategically misguided. UCC research indicates that by 2035, DCs will drive more peak grid demand than all other sectors combined. Ireland will also overshoot its EU EED 2040 final energy consumption target. Short-term gas reliance will drive an overshoot of the 2030 RES-E target, while the subsequent pivot to renewables will require a capacity equal to the entire 2030 national offshore wind target. The resulting carbon budget overshoots would demand impossible compensatory cuts in other already heavily constrained sectors. It is noted that Ireland is internationally recognised as a cautionary tale. Current policy also creates further gas dependency and additional renewables does not equate with greater decarbonisation. The UCC research concludes that the current policy formulation creates significant conflict between large demand growth and Ireland's commitments on climate, energy efficiency and fossil fuel phase-out. [20]

- The SEAI have consistently noted that rapidly expanding electricity demand from data centres poses a critical risk to Ireland's legally binding national and EU climate targets. Unlike electrifying heat and transport, which lowers overall emissions by replacing fossil fuel use, data centre expansion adds demand without displacing fossil fuels elsewhere in the economy. Because demand growth driven by data centres has outpaced renewable installations, new renewable output merely absorbs increased load rather than delivering absolute emission reductions. They note that this trend impacts power grid resilience and electricity costs. Consequently, the SEAI highlight an urgent need for a clear strategy to assess whether admitting new large electricity users aligns with Ireland's decarbonisation commitments.[21]

- Since CRU decision, the Government has published its Large Energy User Action Plan[22], which aims to facilitate what it calls "the next generation of investment in energy intensive sectors", including data centres and AI. Government has also moved to pass Private Wires legislation, which would allow data centre operators to construct their own electricity cables in certain circumstances. The proposal to

[18] https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2025/2025-03-20_the-future-of-data-centres-in-ireland_en.pdf
[19] https://cruie-live-96ca64acab2247eca8a850a7e54b-5b34f62.divio-media.com/documents/CRU2025236_Large_Energy_User_connection_policy_decision_paper.pdf
[20] Potential impact of the Large Energy User Connection Policy on energy and climate targets Dr. Teresa Bonserio, Prof. Hannah Daly https://www.esri.ie/sites/default/files/media/file-uploads/2026-06/9.Teresa_UCC-ESRI-MaREI%20seminar.pdf
[21] SEAI National Energy Projections Report 2025 https://www.seai.ie/sites/default/files/publications/National-Energy-Projections-Report-2025.pdf SEAI National Energy Projections report 2024 https://www.seai.ie/sites/default/files/publications/National-Energy-Projections-Report-2024.pdf
[22] https://enterprise.gov.ie/en/publications/publication-files/leap-large-energy-user-action-plan.pdf

introduce private wires, in its current form, carries major risks of not only increased emissions, as it does not explicitly prohibit connections to fossil fuel generation, but it also risks a diversion of renewable and financial resources away from the public electricity grid. We reiterate that Government should align the Bill with the PLS report of the Oireachtas Committee on Climate.

- The Climate Change Advisory Council has also warned that Ireland's electricity system is failing to meet decarbonization objectives, with rising electricity demand and insufficient renewable deployment among the key challenges. Additional data centre demand will, according to the CCAC, "*continue the well-established trend of data centres cannibalizing any increase in Irish renewable capacity… while ensuring a guaranteed increase in emissions from fossil fuel use for on-site generation*."[23]

- Ireland already has the highest household electricity prices in the EU, with 319,000 households in arrears on their electricity bills. [24] Detailed research commissioned by Friends of the Earth indicates that additional data centre demand has increased household electricity bills, with the poorest households paying an additional €209 between 2021-2023.[25] Projections for the coming decade indicate that limiting data centre demand while accelerating renewable energy deployment could save the average household an estimated hundreds of euros cumulatively between 2025 and 2034. We have serious concerns regarding research recently carried out by KPMG for the Department of Enterprise on data centre impacts. We consider that significant grounds exist for the Department to assess and require a moratorium on data centre development, moving beyond the CRU LEU decision, until such adverse impacts have been mitigated.

Buildings & Heat

- While new and expanded measures in the National Residential Retrofit Plan 2026 are welcome, additional retrofitting support should be prioritised for households at risk of energy poverty. In particular, targeted supports should reach underserved groups facing disproportionate barriers to energy upgrades, including older people living in poorly insulated homes, members of Traveller and Roma communities, students, single-parent families, people in emergency accommodation and private renters.

- A large share of homes remain inefficient and expensive to heat, while fossil fuel dependence remains dominant. 35% of households rely on gas for central heating and another 35% on oil[26], locking the majority of homes into volatile fossil fuel markets. At the same time, Ireland imports almost 80% of its energy, including all oil

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23 https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/contentassets/documents/news/CCAC-AR2026-2-electricity-final.pdf

24 https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Electricity_price_statistics ; https://www.thejournal.ie/energy-bills-arrears-electricity-gas-6969259-Feb2026/

25 https://www.friendsoftheearth.ie/assets/files/pdf/the_cost_of_data_centres_-_modelling_the_household_electricity_costs_of_irelands_data_centre_sectordocxpdf.pdf

26 https://www.cso.ie/en/releasesandpublications/ep/p-dber/domesticbuildingenergyratingsquarter42025

and most gas. As noted above, we consider the continued expansion of the gas network, gas-fired boilers in existing houses, and gas-fired generation particularly problematic, not only given potential lack of climate with national and EU law but also as it directly exposes households directly to global price shocks[27].

- The consequences of this are visible across both social and climate indicators. Energy poverty remains a hugely significant problem. In 2025, 8.3% of households with utility bills had arrears on utility bills, while 7.5% of people went without heating at some stage in the previous 12 months through lack of money and 4.5% were unable to afford to keep their home adequately warm.[28]

- Arrears are also rising sharply. The average electricity arrears balance is now 10% higher than in December 2024. CRU data from December 2025 shows energy arrears at their highest level on record, with 14% of electricity customers and 26% of gas customers in arrears. [29] Given the level of gas arrears and risks to those vulnerable to energy poverty, we consider any installation of gas-fired boilers, ahead of energy efficiency measures, to be extremely regressive.

- The SEAI's BETT analysis shows that even in summer, over 25% of participants still met energy poverty thresholds or reported affordability distress. This undermines any suggestion that short-term seasonal credits should be a permanent solution. The BETT data also highlights that low-income households actively cut essential heating/cooking to avoid arrears, leading to hidden deprivation that is not presented in utility metrics. This further supports the health and societal benefits of energy efficiency measures.[30]

- More broadly, the ESRI has estimated that in 2024, at least 14% of households self-reported experiencing energy poverty, while over 30% of households experienced some form of energy affordability challenge when multiple indicators are considered, underscoring the scale of the crisis.

- The ESRI previously estimated that 29% of households were in energy poverty using the 10% expenditure-based measure; however, this estimate is from 2022. We recognise this measure has limitations and prioritising it alone would risk overlooking cohorts in need of support. However, we would underline that Ireland still lacks an up-to-date estimate using this traditional measure, making it difficult to assess how energy poverty has changed over time.

- Energy poverty is driven by the intersection of low incomes, high energy costs and poor-quality housing, yet policy responses have not adequately targeted these root causes. Evidence shows that the groups most affected by energy poverty include

[27] https://www.seai.ie/data-and-insights/seai-statistics/key-publications/national-energy-balance
[28] https://www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilcenforceddeprivation2025/deprivationitems/
[29] https://cruie-live-96ca64acab2247eca8a850a7e54b-5b34f62.divio-media.com/documents/CRU202616_Arrears_and_NPA_disconnection_update_December.pdf
[30] https://www.seai.ie/sites/default/files/publications/bett-energy-poverty-in-ireland.pdf

renters, single-parent households, older people and those with disabilities, groups already facing wider inequality[31]. Without a decisive shift in approach, these inequalities will deepen as both the impacts of climate change and energy costs intensify.

- In this context, the finalisation and implementation of the National Energy Affordability Action Plan, Social Climate Plan and National Building Renovation Plan should be prioritised. The Social Climate Plan is particularly important in ensuring access to vital funds that directly support vulnerable households, communities suffering from energy poverty and those hit hardest by the ongoing energy crisis[32]. The National Building Renovation Plan should establish a clear pathway for phasing out fossil-fuel boilers by 2040, consistent with Ireland's stated policy objective and the requirements of the revised Energy Performance of Buildings Directive. The Plan should also provide a clear, funded pathway for delivery, with particular attention to households and communities least able to meet the upfront costs of adaptation and renovation.

- We recommend the following further measures are introduced in CAP26:

➢ Introduce the promised minimum BER standards for rental properties immediately, starting with the coldest, most inefficient homes, while also ensuring adequate protections for tenants.
➢ Retrofit all social housing by 2030, prioritising the worst-performing buildings first.
➢ Establish a community energy advice service in every local authority, offering independent, tailored guidance on energy efficiency and renewable energy options.
➢ Pass a National Heat Law that sets an end-date for new fossil fuel boilers and ensures heat pumps and district heating systems are cheaper for households.
➢ Create a retrofit scheme specifically for rural homes that rely on solid fuel or oil boilers.
➢ Expand the Warmer Homes Scheme to include HAP tenants, on the condition that a long-term lease is offered.
➢ Prioritise energy poverty measures for marginalised groups, including older people living in badly insulated homes, Travellers living in trailers, Roma, students, one-parent families, people in emergency accommodation, and tenants renting from private landlords.
➢ Develop a comprehensive measurement of energy poverty that goes beyond expenditure, and that takes account of factors such as reduced usage due to high prices.

Question 4

In addition to the priority areas you have already identified in previous questions, which other areas should this update to the Climate Action Plan focus on?

<u>Production and Delay</u>

[31] https://energy-poverty.ec.europa.eu/newsroom/news/thematic-focus-equity-and-vulnerable-consumers-understanding-energy-poverty
[32] https://ejni.net/publications/what-irelands-social-climate-plan-must-include-six-key-priorities/

- The consultation and production of the CAP has been significantly delayed, raising concern that actions have already been largely developed. A more informative and fruitful approach to CAP development would be to bring proposed measures forward for consideration and to organise not only a written public consultation, but also stakeholder meetings and public dialogues on their formulation. Additionally, information is not presented on how public submissions influence decisions. Government should move beyond basic consultation to inclusive, accessible, and structured dialogue that visibly shapes policy, clearly demonstrating how feedback informed its specific actions.
- We note that the adoption of a complete set of sectoral emissions ceilings for the periods 2026–2030 and 2031–2035, within the cumulative constraints of Carbon Budgets 1–3, has been delayed, while the sectoral emissions ceiling process for these periods remains incomplete, due both to the provision for "unallocated emissions reductions" and to the omission of the LULUCF sector. Additionally, the Government is yet to address the recommendations for Carbon Budgets 3 and 4 (2031-2040) set out in December 2024 Proposal[33] from the Climate Change Advisory Council (CCAC). An independent, transparent peer review process for the Carbon Budget 3 and 4 proposal is needed.[34] However, as recently noted by academic experts[35] **these parallel processes relating to adoption or revision of carbon budgets should not result in further delays to CAP26 development and implementation.**

<u>New CAP format</u>

- We note the statement from the Secretary General that "The Minister has been clear as to his intentions with respect to the next update to the climate action plan. He wants it to be a more strategic and delivery-focused document, setting out high-level, multi-annual actions to concentrate efforts on implementation, as opposed to annual plan-making. This approach is in line with feedback from stakeholders, including the EPA and the Climate Change Advisory Council, CCAC, which have pointed to the need for accelerated implementation of existing plans. " [36]

- We recognise that the development and reporting of the Climate Action Plan is a significant cross-Departmental exercise. **However, we would have significant concerns were CAP26 to become a higher-level, less specific or less prescriptive document, accompanied by an expectation that a more**

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[33] https://www.climatecouncil.ie/media/Letter%20to%20Minister%20RE%20CCAC%20Carbon%20Budget%20Proposal%20.pdf

[34] https://ejni.net/publications/consistent-paris-test-assessment-of-the-2024-proposal-for-irelands-2031-2040-carbon-budgets/ SCC has also noted that the proposed Carbon Budgets 3 and 4 (2031-2040) should be subjected to an open and independent peer review process. Temperature neutrality should be rejected as a basis for Ireland's carbon budgets and budgets should be adopted that not only align with Ireland's international obligations, but are also clearly defined to be in line with Ireland's fair share of limiting global warming to 1.5ºC on the basis of equity and the "CBDR-RC" principles set out in the UNFCCC and international climate obligations.

[35] https://www.ucc.ie/en/media/research/energypolicyandmodellinggroup/Letter-CAP26_delay.pdf

[36] https://www.oireachtas.ie/en/debates/debate/joint_committee_on_climate_environment_and_energy/2026-06-17/speech/3/

substantive CAP27 would follow. The primary focus of CAP26 must be on bringing forward new, additional and accelerated actions to close the clearly projected gap between emissions and the available carbon budget for the current budget period, 2026–2030 (CB2).

- The Plan should not therefore become so high-level that it ceases to identify the sector-specific actions, milestones and corrective measures required under the Act. The Department will be aware that under Section 4(2)(b) of the Climate Act, the Climate Action Plan must set out a roadmap containing sector-specific actions required to comply with the carbon budget and sectoral emissions ceiling for the period to which the Plan relates, as well as sector-specific actions to address any actual or projected failure to comply with carbon budgets and sectoral emissions ceilings. The provision is broader than merely requiring a response to a breach. Section 4(2)(b)(ii) uses mandatory language “shall” meaning that the Climate Action Plan must contain sector-specific actions to address any actual or projected failure to comply with a carbon budget and sectoral emissions ceiling.

- The Climate Action Plan must also be consistent with the carbon budget programme: under Section 4(2)(a), in preparing the Plan, the Minister “shall ensure” that it is consistent with that programme. Therefore, the Plan cannot simply amount to a listing of relevant Departmental initiatives; its roadmap must be constructed within, and respond to, the legally established carbon-budget framework. Section 4(8) imposes further considerations when the Minister and Government perform their functions under Section 4: they must have regard not only to value for money, but also to sustainable development and climate justice, the recommendations and advice of the Climate Change Advisory Council, public health, and the most recent approved national long-term climate action strategy, including its implications for the phase-out of fossil fuels.

- Overall, it is essential that CAP26 presents credible policies and measures capable of bringing emissions into compliance with the carbon budget by 2030, while also laying the foundations for the progressively deeper emissions reductions required beyond 2030. It is important to note the EPA projections report highlights that: "*Climate Action Plan 2025 is not specifically referenced in this report as it had yet to be published during the preparation phase of the 2024-2055 projections. A review was undertaken and there are no significant additional measures in CAP 2025 therefore no major omissions in these projections.*" I.e. those new actions were not significant enough to materially alter the emissions projections. In circumstances where the State is already projected to miss its 2030 target and carbon budgets, that raises a legitimate question as to whether the annual CAP process is being used as the Act envisages to introduce additional sector-specific actions required to address compliance with the carbon budgets and sectoral emissions ceilings. Given that the 2026 EPA projections also note that Ireland remains substantially off track, despite some improvement, this makes the issue of annual CAP process generating sufficiently strong corrective measures even more relevant

- We note that past plans lack the detailed quantification, justification, and implementation pathways needed for the public to verify legal compliance or

determine whether proposed actions will meet emission targets. CAP 2026 must address this by providing explicit figures and clear reasoning for chosen measures, bringing the plan into alignment with the Climate Act and Article 5(7) of the Aarhus Convention, which requires the publication of key facts and analyses used to formulate major policies. As has been noted by Stop Climate Chaos, in Friends of the Irish Environment v Minister for *the Environment, Climate and Communications & Ors*, the High Court provided guidance to the Government on the development of Climate Action Plans, suggesting that to ensure consistency with the carbon budgets with "high confidence" the Climate Action Plan could provide for "more reductions than the budget requires, to allow for a shortfall in implementation."[37] The judgment further suggests that when consulting the public on Climate Action Plans, the Department could publish a draft Plan to make the consultation process more meaningful.[38]

Parliamentary Accountability Mechanism

- Each year, following publication of the Climate Change Advisory Council's annual report and the EPA reports, Ministers must, following a written request from a Joint Committee, appear before that Committee and account for progress under the latest approved Climate Action Plan, including the policies, mitigation and adaptation measures adopted, changes in greenhouse gas emissions, compliance with the carbon budget, and the measures envisaged to address any non-compliance. Despite this clear statutory framework and the seriousness of the current situation, Ministers have not appeared before the Committee to account for implementation of the Climate Action Plan since 2025. This also raises questions as to whether the accountability requirements set out in Section 14A of the Climate Act are being properly adhered to in practice.

Fossil fuel Phase Out

- CAP26 should include an explicit, time-bound roadmap for the managed phase-out of fossil fuels, with milestones aligned with Ireland's carbon budgets and 2050 climate-neutrality objective, rather than relying primarily on the expansion of renewable energy to deliver decarbonisation. This is particularly important given Ireland's continuing dependence on fossil fuels. **See existing commitments on this issue outlined in Annex 1.** The SEAI has noted that, although renewable energy continued to grow, overall energy use increased by 2.3% in 2024 and demand growth outpaced renewable growth. It has underlined that new renewable capacity must deliver genuine fossil-fuel displacement rather than simply accommodating additional demand.[39] The CCAC has identified the phase-out of harmful fossil fuels as a crucial step, with its 2024 carbon-budget advice pointing to a phase-out as early

[37] Paragraph 82.
[38] Paragraph 134.
[39] https://www.seai.ie/sites/default/files/publications/Energy%20in%20Ireland%202025%20v1.0%20complete.pdf

as 2039.[40]It has also noted that ending dependence on imported fossil fuels would benefit energy security and reduce costs for households and businesses, while warning that delayed emissions reductions increase the risk of non-compliance costs.[41]

- France provides a useful policy comparator. Its newly adopted National Low-Carbon Strategy (SNBC 3) explicitly makes "exiting fossil fuels" a strategic objective, setting national timelines for ending coal consumption by 2030, oil consumption by 2045 and fossil-gas consumption by 2050, while also making reduction of final energy consumption a separate strategic objective.[42] Ireland's next Climate Action Plan should similarly establish a clear trajectory for reducing and ultimately eliminating fossil-fuel dependence, with sector-specific interim milestones and policies to manage demand and avoid locking in unnecessary new fossil-fuel infrastructure.

- From a legal and implementation perspective, such an approach would also provide a clearer basis for demonstrating how the Government intends to address projected failure to comply with carbon budgets and sectoral emissions ceilings, as required under section 4(2)(b) of the Climate Act. It would also give Departments, regulators, network operators and investors greater clarity about the expected trajectory of the energy system and reduce the risk of inappropriate investment and stranded assets.

- This approach aligns with Ireland's co-hosting with Tuvalu of the next conference to Transition Away From Fossil Fuels. For Ireland to credibly lead on fossil fuel phase out internationally it must ensure that its national plan supports this framework. The Government should also take account of recent legal analysis which provides a foundation for discussions ahead of the Second Conference on TAFF in Tuvalu and explore potential treaty scope, principles, commitments and mechanisms to encourage broad participation and implementation. Drawing on existing international environmental governance and legal precedents, they demonstrate that while some elements may require innovative approaches, there is already a strong basis for developing the treaty and provide a starting point for further discussion on its design and implementation. [43]

Question 5

The Joint Oireachtas Committee on Climate, Environment and Energy published a Report on Barriers to Achieving Climate Targets (2026-30) in February. Do you agree with the findings of this Report? What other barriers to achieving the climate targets, if any, would you identify? How best can the identified barriers be addressed?

We firstly re-iterate that the primary focus of CAP26 must be on bringing forward new, additional and accelerated actions to close the clearly projected gap between emissions and the available carbon budget for the current budget period, 2026–2030 .

[40] **https://www.climatecouncil.ie/news/2024/press-release-carbon-budget-proposal.html**
[41] https://www.climatecouncil.ie/news/2024/chairs-statement-q1-2024-quarterly-emissions-indicator-report.html
[42] **https://www.ecologie.gouv.fr/strategie-nationale-bas-carbone/suivi-des-objectifs**
[43] https://www.fossilfueltreaty.org/optionspapers

We note further sector specific issues below.

Data Centre Demand

We note that the Committee in the Report identifies rapidly rising demand from Large Energy Users as a major barrier to grid availability for renewable generation and electrification and highlight the need to make renewable energy a condition for data centre development. **We would underline that Government must go beyond this recommendation**: As noted above, the CRU estimates that data centres could add 5.8GW of electricity demand in the medium term, creating significant tensions with Ireland's climate, energy-efficiency and fossil-fuel phase-out commitments. New UCC research indicates that data centres could account for more peak grid demand than all other sectors combined by 2035, while the resulting reliance on gas and substantial additional renewable capacity could contribute to Ireland missing its energy and emissions targets. The SEAI has similarly identified rapidly growing data-centre demand as a critical risk to national and EU climate targets, noting that unlike electrification of heat and transport, this demand does not displace fossil-fuel use elsewhere. The Government's Large Energy User Action Plan seeks to facilitate further investment in energy-intensive sectors, while proposed private-wires legislation could increase emissions if connections to fossil-fuel generation are permitted and could divert renewable capacity and investment from the public grid. Government should therefore reject fossil-fuel connections, ensure compliance with climate law, and align the Bill with the Oireachtas Climate Committee's PLS report. Academic research commissioned by Friends of the Earth also indicates that increased data-centre demand contributed to higher household electricity bills, with the poorest households estimated to have paid an additional €209 over 2021–2023. **Given these impacts, there are significant grounds for DECC to assess and require a moratorium on further data-centre development, moving beyond the CRU LEU decision until the adverse impacts have been mitigated.**

Development of state-led LNG

Friends of the Earth does not consider a new LNG terminal, whether State-owned or commercial, to be an appropriate, sustainable or effective long-term response to Ireland's energy-security or climate objectives.

The proposed State terminal would impose a significant financial burden, estimated at around €900 million over a decade, with costs potentially recovered through a new levy on consumers already facing high energy bills. We consider it highly problematic that Government is seeking to introduce legislation for a state-led FSRU without transparent analysis of costs and their allocation.

The Government's Energy Security Review recognised that any strategic gas reserve should not increase gas demand and must be consistent with Ireland's climate law and climate targets. This is particularly relevant to the N-1 issue, which is increasingly being presented as a supply problem when a significant part of the pressure on the gas system arises from unmanaged demand growth, including rapid data-centre expansion. The recent advisory opinion of the International Court of Justice further underlines the legal significance of states' obligations to address climate harm and limit greenhouse-gas emissions. We therefore consider it at best legally questionable that such conditions from the Energy Security Review were excluded from the Government's Strategic Gas Reserve Bill.

The proposed disapplication of section 15 of the Climate Action and Low Carbon Development Act in the Strategic Gas Reserve Bill is also highly problematic. An emergency gas-security measure should not be allowed to operate outside the statutory framework that requires Government policy to be consistent with Ireland's climate objectives, particularly where the measure could facilitate continued or increased fossil-fuel dependence. We also do not consider it reasonable or appropriate thaT Government has not accepted the recommendations made by the Joint Oireachtas Committee during pre-legislative scrutiny, including that the reserve comply explicitly with the Climate Act, carbon budgets and the Climate Action Plan; that it should not increase gas demand; that imported fracked gas should be excluded; that the reserve remain fully State-owned and for emergency use only; that new commercial LNG infrastructure should be prevented; and that there should be a transparent cost-benefit assessment, including the impacts on consumers and taxpayers and comparison with alternatives such as demand reduction and renewable energy.[44]

Such conditions are even more relevant in light of recent events which have demonstrated the vulnerability of global gas markets to geopolitical disruption. The attacks on Iran have raise significant implications regarding assumptions underpinning greater reliance on LNG. Disruption to the Strait of Hormuz and damage to Qatar's LNG infrastructure have demonstrated how geopolitical events can affect LNG supply, shipping and prices well beyond the immediate region. European gas prices rose sharply following the disruption, while LNG cargoes were redirected towards competing markets, illustrating that access to LNG does not necessarily equate to secure or affordable supply. In this context, proceeding with a policy that increases Ireland's exposure to global LNG markets, while weakening the application of section 15 and declining to adopt the Oireachtas Committee's recommendations, would be difficult to reconcile with a robust approach to energy security (and fossil fuel phase out commitments in existing policy as noted in Annex 1). Government should therefore undertake and publish an updated energy-security assessment before enactment and implementation of any preferred approach. That assessment should properly examine demand-side measures, climate-aligned gas-demand projections, the costs and risks of LNG dependence, and the implications of the changed global energy-security environment.

S.15 Disapplication

As recognised by the Supreme Court in *Coolglass Wind Farm Limited v An Bord Pleanála* [2026] IESC 5, section 15 'applies to the functions of all relevant bodies' and operates as a form of climate sense check to ensure that decisions and actions of public sector bodies are aligned with the climate objectives.

The Department is aware that not only the Strategic Gas Reserve Bill, but also the Dublin Airport (Passenger Capacity) Bill and Critical Infrastructure Bill disapply section 15,from functions being carried out under those Acts. This removes the requirement for consideration of the climate policies and objectives specified in section 15 when relevant decisions are

44 https://data.oireachtas.ie/ie/oireachtas/committee/dail/34/joint_committee_on_climate_environment_and_energy/reports/2026/2026-02-26_report-on-pre-legislative-scrutiny-of-the-general-scheme-of-the-strategic-gas-emergency-reserve-bill-2025_en.pdf

made under these legislative frameworks. It will not improve the quality or robustness of decisions made.

It risks limiting the information and perspectives available to a Minister or public body as they make critical decisions that will impact current and future generations. The fact that alternative environmental assessment or other statutory processes may continue to apply does not remove the importance of the broader statutory climate framework established by section 15.

The piecemeal disapplication of the Act presents a threat to achieving climate targets. We recommend that the Climate Action Plan contain a commitment to preserving the integrity of the Act and outline how public bodies will comply with their section 15 obligations. The Supreme Court's confirmation of the breadth of section 15 makes the preservation of a consistent, cross-government climate check particularly important.

If the underlying aim of the proposed changes is to reduce challenges to relevant decisions, it should be noted that this could be achieved by improving the quality of decision-making through the adequate financial and human resourcing of local authorities, enforcement agencies, and relevant public bodies. This should be supported by regular training to ensure that public bodies, at all levels of government, are equipped to meet their Section 15 obligations. Deeming a Bill's compliance with Section 15 of the Climate Act, or exempting a Bill from the Section 15 obligations entirely, will not improve the quality of decision-making, but will instead make it more difficult to challenge bad decisions.

Residential Heating

We have significant concerns regarding Government interest/support for natural gas and HVO in residential heating. The ESRI's recent review of residential heat policy in Ireland is extremely problematic in this regard.[45] The report identified the shortcomings in Ireland's current approach to residential decarbonisation, but its response is problematic as it supports blending with lower fuels which would risk entrenching fuel dependence rather than addressing the structural barriers preventing lower-income households from accessing energy efficiency and electrified heating. While the ESRI noted this as an additional rather than alternative policy to energy efficiency and electrification, we have concerns that such views have been accepted in some parts of Government. A range of bodies at both national and EU level are clear that supporting further natural gas heating as a 'lower carbon fuel' option is a regressive step. This is the case not only for climate reasons but also given energy security impacts and the opportunity cost of keeping millions of homes dependent on combustion technologies.[46] It also fails to address the significant quality of life benefits of residential retrofitting.[47] We would also note that the ESRI's approach does not align with recommendations in the SEAI's Heating and Cooling Assessment, as well as conclusions

[45] https://www.esri.ie/publications/a-review-of-residential-heat-decarbonisation-in-ireland
[46] https://www.seai.ie/blog/hvo-can-be-part-of-our-cl
[47] https://www.seai.ie/blog/most-powerful-reason-upgrade-your-home-it-will-be-warmer-and-more-comfortable

drawn in previous ESRI papers.[48] **In the coming weeks, Friends of the Earth will publish independent research regarding the adverse impacts of policy related to Hydrotreated Vegetable Oil and Biomethane in the home heating sector and would welcome the opportunity to discuss these issues directly with relevant officials.**

Question 6

The principles of a Just Transition (evidence-base and structured; skills and opportunity; fair sharing of costs; social dialogue and lived experience) are explained by the Just Transition Commission. What are your views on how these principles can be incorporated into the next CAP or climate action more generally?

- We strongly support the JTC's recent reports. They provide a strong evidence base and practical framework for embedding just transition principles in climate policy. These are good starting points and we support Government implementation of their recommendations. In particular, we support the specific letter to the Minister on development of the CAP. [49] These recommendations should be reflected in the next Climate Action Plan.

- The Government must also follow through and put the JTC on a statutory footing for its second iteration. The Government should utilise the National Economic and Social Development Office Act 2006 to establish the Commission within the existing statutory framework, alongside NESC. If this is not possible for legal reasons, primary legislation should still be brought forward in this regard.

- The Government should make greater use of the National Training Fund to support dedicated just transition training and professional development for civil servants involved in climate, energy, agriculture, regional and economic policy. This should build understanding of the social and distributional impacts of the transition, as well as skills in evidence-based policy design, stakeholder engagement and identifying new economic and employment opportunities. Building this capacity across the civil service would help embed just transition principles in mainstream policy development and delivery, rather than treating them as a separate or specialist issue

- There is an urgent need for both targeted supports and long-term solutions that ensure that the energy transition does not result in a two-tier energy system, whereby higher-income households can benefit from cheaper, cleaner energy, while others remain left behind in cold, damp homes, dependent on increasingly expensive fossil fuels. Recent research from Pobal shows this divide is already emerging, with households in the most disadvantaged areas almost five times less likely to use renewable energy than those in the most affluent communities. Pobal's research found renewable energy adoption of 9.9% in the most disadvantaged areas

[48] https://www.seai.ie/data-and-insights/heating-and-cooling-assessment ; https://www.esri.ie/publications/empowering-homes-unravelling-the-connection-between-energy-efficiency-and-well-being

[49] https://justtransitioncommission.ie/just-transition-commissions-recommendations-for-the-update-of-climate-action-plan-2026

compared with 45.6% in the most affluent areas. [50] Government should support Pobal and IHREC to undertake further research in this area, building the evidence base needed to understand and address inequalities in access to renewable energy.

- Carbon budgets should be integrated with annual fiscal planning, ensuring each annual Budget recognises the urgency of the climate crisis and directs meaningful investment toward a just transition. Climate Action Plans and their implementation should also be embedded in core Government decision-making and machinery, including the National Economic Dialogue, development plans and the Budget. This would help ensure that climate action and just transition considerations are incorporated across Government policy and investment decisions, rather than being treated as a separate policy process.

- The EPA previously produced research shows that 74% of people in Ireland believe that climate action will improve the quality of life in Ireland.[51] However, to ensure that everyone can benefit from the transition, a credible plan is needed to rapidly reduce Ireland's emissions within the short-term.

- In February 2026, the United Nations Special Rapporteur on human rights and the environment, Astrid Puentes Riaño, stated in her End of Mission Statement that Ireland should mainstream human rights across environmental policy to protect existing environmental advances. She also highlighted concerns about Government proposals that could weaken environmental protections, emphasising the need to "advance meaningful participation" of the public as rights-holders. This provides a strong basis for ensuring that climate and environmental policy, including the next CAP, protects environmental standards while strengthening meaningful public participation, human rights and democratic accountability.[52]

- The next CAP should commit to establishing a robust evidence base to inform the development of just transition targets, as noted by Community Law & Mediation. This evidence should identify those most vulnerable to climate change and other environmental harms, as well as those at risk of being left behind by climate action or bearing disproportionate economic and social costs, with primary qualitative data that centres lived experience given equal weight to quantitative data and secondary sources. This evidence base should inform the development of just transition indicators to assess whether climate action is being delivered fairly, with measures and actions evaluated on how they reduce inequalities, support those most affected by climate action, and improve health and wellbeing. The lived experience of those

[50] Pobal (2025) Renewable Energy and Deprivation: Investigating the Relationship between Area-Level Deprivation and Household Renewable Energy Usage using the Pobal HP Deprivation Index https://www.pobal.ie/wp-content/uploads/2025/09/250298-Renewable-Energy-Research-Report-2025-FINAL-190925. Pdf

[51] Environmental Protection Agency, 'People in Ireland continue to be positive about benefits of climate action' (27 February 2024) https://www.epa.ie/news-releases/news-releases-2024/people-in-ireland-continue-to-be-positive-about-benefits-of-climate-action-.php

[52] https://www.ohchr.org/sites/default/files/statements/20260220-eom-stm-ireland-sr-right-a-en.pdf

affected should be central to this evaluation and would strengthen the integration of just transition principles into climate policy. Future Climate Action Plans should incorporate intersectional, evidence-based analysis in particular to address the needs of groups currently underrepresented in policy, including women, migrants, people with disabilities, Roma, and Travellers. The lack of disaggregated data and vulnerability metrics risks undermining equity outcomes and highlights the need for improved measurement frameworks.

Question 7

The National Adaptation Framework and the Sectoral Adaptation Plans have been published. To what extent should further climate change adaptation measures be included in the next CAP?

- Given the escalating impacts of climate change, CAP 2026 should strengthen cross-government coordination and accountability for climate adaptation, including through a dedicated adaptation function within the Department of the Taoiseach, building upon the existing Climate Action Delivery Board and National Adaptation Steering Committee. The experience of the COVID-19 response could inform the effective use of these structures to ensure timely, coordinated action across Departments and State bodies.

- We note that the Comptroller and Auditor General's 2025 review highlights that responsibility for delivering Ireland's climate objectives spans several Departments, with different Ministers holding responsibility for individual sectoral emissions ceilings. This framework reinforces the need for clear cross-government coordination, monitoring and accountability. CAP 2026 should therefore strengthen central oversight of adaptation delivery, with clear responsibilities, measurable milestones and regular reporting across Departments.

- The Climate Change Advisory Council and Central Bank have noted that climate adaptation and infrastructure protection is fragmented and note resource gaps across departments and local government. They have recently stated that “without considerable progress in scaling investment in adaptation, Ireland risks falling behind in building the resilience needed to withstand future climate shocks”.[53] The next Climate Action Plan should prioritise targeted funding for adaptation capacity and training across Departments and local government, including by exploring the use of the National Training Fund to support climate adaptation training for public officials. This should be accompanied by clear, measurable local adaptation milestones that protect public safety and strengthen accountability.

- The Department may also wish to take account of ‘Putting people at the centre of UK climate adaptation and resilience’ , a new report from ACCESS and the UK Government Office for Science. The report notes the value of placing people, communities and social science at the centre of adaptation decision-making, rather than only relying primarily on technical assessments of climate risk. In Ireland, where

[53] https://www.centralbank.ie/docs/default-source/publications/climate-change/funding-climate-adaptation-in-ireland.pdf

adaptation capacity and public awareness of risks such as flooding, wildfire and severe storms remain uneven, this approach highlights the importance of building local understanding, engaging trusted community actors and co-designing adaptation measures with those affected. It also addresses the need for place-based approaches that recognise differences in exposure, vulnerability and capacity to adapt across communities and sectors. Given limited adaptation resources, the report's emphasis on linking adaptation with wider objectives such as health, biodiversity and wellbeing is particularly relevant, as is the need to assess policies for unintended consequences and maladaptation. It provides a useful framework for developing more inclusive and locally informed adaptation policy, while supporting more effective use of limited resources.[54]

- The next Climate Action Plan should assess whether existing planning and environmental permitting arrangements fully incorporate the range of climate risks identified in the National Climate Change Risk Assessment, in particular extreme heat, drought, rainfall and flooding. A common national approach to climate-risk screening could be developed for major developments and infrastructure. The purpose would be to ensure that planning decisions are robust under future climate conditions, including appropriately selected low-likelihood, high-impact scenarios, rather than to create new planning approval functions for relevant agencies. This should build upon existing National Adaptation Framework and Local Authority Climate Action Plans.

- Government should also strengthen its capacity to analyse the implications of low-probability, high-impact changes in the North Atlantic climate system, in particular substantial weakening of the Atlantic Meridional Overturning Circulation (AMOC) and to assess national and sectoral adaptation strategies against such impacts. This should be developed as a scientific monitoring, scenario-analysis and stress-testing function. The purpose would instead be to identify vulnerabilities to a plausible but highly consequential change in the North Atlantic climate system and to determine whether current adaptation strategies remain effective under such conditions. This would build on the Climate Change Advisory Council's work on "High++" scenarios and on the EPA's identification of AMOC as a potentially important tipping-point risk for Ireland in its National Climate Change Risk Assessment. There important knowledge gaps remain, the EPA and relevant research bodies should commission targeted research to improve the Irish evidence base.

- The extreme heat experienced in recent summers has highlighted major risks for vulnerable individuals, particularly in medical, healthcare and nursing home facilities. SEAI's 2025 Heating and Cooling Assessment addresses the need to avoid overheating through improved building performance and passive cooling, and highlights hospitals' need for temperature and humidity control. Government should explore the development of a cooling and health resilience policy as part of its forthcoming heating and cooling plan, to ensure that hospitals, nursing homes and other relevant facilities can maintain safe indoor temperatures during extreme heat. This should include an examination of whether existing mandates and funding

[54] https://accessnetwork.uk/task-forces-adaptation-and-resilience-task-force/

mechanisms are sufficient to support passive and active cooling, as well as the need to incentivise operators of hospitals and nursing homes to introduce cooling measures. This could include a requirement for facilities to carry out a risk-based assessment, and for relevant bodies to establish temperature standards. The purpose would be to support in the first instance the introduction of passive measures (e.g. shading, ventilation or insulation upgrades) followed by cooling and humidity control where necessary. The Department should also explore targeted funding and supports, including refurbishment standards and Accelerated Capital Allowances. The approach should be incorporated into Ireland's transposition and implementation of the EED's Article 25 requirement for heating and cooling plans.

Annex 1 Government policies and plans

Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy 2022

. It recognises that "*the capacity constraints experienced by our electricity system today, and the binding carbon budgets that require rapid decarbonisation of energy use across all sectors,* ***necessarily mean that not all existing demand for data centre development can be accommodated***."

CRU 'Ireland's Electricity Sector Risk Preparedness Plan (2026-2029)'.

"*Ireland's electricity demand growth has significantly exceeded the EU average in recent years and is predicted to grow rapidly and beyond normal expected economic patterns in the coming years, primarily due to increasing data centre loads. In this scenario, this level of demand is anticipated to give rise to an adequacy gap with inadequate capacity available to supply this demand."*

"Rapid above-trend growth in electricity demand" (Scenario IE.RG) as a "High" rated risk with a "Likely" (1 in 2 to 5 years) probability. It highlights data centres as the primary driver of this expansion, which are projected to account for 31% of all electricity demand by 2030

"*Demand from data centres and large LEUs is anticipated to remain relatively consistent throughout the year, leading to a sustained high level of demand*."

It mentions "supporting the transformation to net zero". The plan is focused on maintaining the "Loss of Load Expectation" (LOLE) standard through fossil-fuel-based generation.

SEAI National Energy Projections Report 2025

https://www.seai.ie/sites/default/files/publications/National-Energy-Projections-Report-2025.pdf

'In the context of legally binding national and EU climate and energy obligations, the consequences of allowing new large electricity users, such as datacentres, to establish in

Ireland are critical. If the scale and pace of renewable energy growth cannot exceed that of electricity demand, as has been the case for the past two years, then renewables are just abating further increases in emissions rather than delivering emissions reductions. The resilience of Ireland's power system to supply shocks, the affordability of electrification across all sectors, and the progress against binding energy and climate obligations are all subject to the demand strategy adopted now.'

'Figure 9 shows projected final electricity consumption, which in the WEM scenario is approximately 41 TWh in 2030, an increase of 30% from 2023. Of this increase, 56% of final electricity consumption growth is anticipated to come from large energy users with the remainder mostly coming from transport and heat electrification. Further expansion of demand continues to pose a significant challenge to the electricity sector, as data centre growth exceeded VRE output in 2023 and 2024. Such expansion will strain progress to RES-E targets and steepen electricity costs, particularly when paired with delays to crucial grid infrastructure projects.'

'Electrification is a key lever for decarbonisation of energy use across many sectors, and thus the timely decarbonisation of electricity generation is crucial to meeting Ireland's climate obligations. Unlike the electrification of heat and transport, growth in new electricity demand from large energy users like datacentres does not displace fossil fuel use elsewhere in the economy. This addition to demand is a risk to decarbonisation progress, especially given delays in the installation of renewable generation capacity. This is not only the case for the electricity sector's national greenhouse gas emissions reduction obligations, but also its total final energy consumption and renewable energy share obligations under the EU targets for the EED and RED. The surge in usage of generative artificial intelligence (AI) will compound issues of unprecedented additional demand.'

'For the WEM and WAM scenarios, the projected growth in datacentre electricity demand out to 2032 is taken from EirGrid's latest Median scenario at the time of input-data freeze.21 EirGrid also produce Low and High demand scenarios. The High scenario assumes that a higher share of the currently contracted datacentre capacity is used (3.7 TWh of electricity consumption in addition to the growth already assumed in the Median scenario by 2030), though it still assumes that some attrition of contracted datacentre demand will occur. It is evident that the scale of energy consumption growth from datacentres is currently on a path to significantly eclipse the electricity consumption growth of any other sector over the second carbon budget period.'

"Unlike the electrification of heat and transport, growth in new electricity demand from large energy users like datacentres does not displace fossil fuel use elsewhere in the economy. This addition to demand is a risk to decarbonisation progress, especially given delays in the installation of renewable generation capacity."

SEAI National Energy Projections report 2024
https://www.seai.ie/sites/default/files/publications/National-Energy-Projections-Report-

2024.pdf

'In the context of our legally binding national and international climate and energy obligations, the negative consequences versus the benefits of allowing new large electricity users, such as data centres, to establish in Ireland needs to be considered.If the scale and pace of renewable energy growth cannot exceed that of electricity demand, as was the case in 2023, then renewables are just abating further increases in emissions rather than delivering the absolute reductions in greenhouse gas emissions required.'

From a national greenhouse gas emissions perspective, increased electricity demand from replacing fossil fuel heating systems with heat pumps or fossil fuelled cars with EVs results in an overall net reduction in emissions. This is because the emissions from the increased electricity demand are more than compensated for by a reduction in emissions in the heat and transport sectors, leading to lower overall emissions. In contrast, increased electricity demand from datacentres and continued growth in the industry, services and residential sectors does not displace fossil fuel use elsewhere in the economy. If total electricity demand increases ahead of the roll-out of renewable generation capacity it will lead to higher emissions. This will make it extremely challenging for the electricity sector to meet its national greenhouse gas emissions reduction obligations.

'...increased electricity demand from datacentres increases total final energy demand and will make it very challenging to meet both the EED and RED targets. The surge in usage of generative artificial intelligence will compound this issue. For these reasons, the negative consequences compared to the benefits of allowing large new electricity users to establish in Ireland between now and 2030 need to be considered.'

'It is possible that significant quantities of biomethane could be purchased by datacentres for use in off-grid electricity generation…any use of biomethane for off-grid electricity generation would be a highly sub-optimal use of this limited and valuable resource.

'It is evident that the scale of energy consumption growth from data centres is likely to significantly eclipse the electricity consumption growth of any other sector.'

'If total electricity demand increases ahead of the roll-out of renewable generation capacity it will lead to higher emissions. This will make it extremely challenging for the electricity sector to meet its national greenhouse gas emissions reduction obligations.

NESC https://www.nesc.ie/publications/council_report_167_econ_resil/

"*...surplus renewable power will be vital to the decarbonisation of industry, but the Council has identified* ***a conundrum – if not an outright contradiction – inherent in the current 'drive demand to drive supply' approach****. The State's ambition for renewable power, to realise the greatest economic co-benefits and to be a competitive exporter of energy, appears to rely on ensuring massive levels of energy demand. But, if growth in demand precedes and exceeds renewables development, on top of that needed to decarbonise*

existing demand, then the State's climate objectives risk being undermined. ***The current approach creates the risk of misdirecting enterprise, energy, investment and climate policy***"

...If the State's ambition for renewable power (and for the delivery of economic cobenefits) relies on ensuring massive levels of energy demand in advance, a widely accepted and practical way of doing so that is in line with the State's climate commitments and objectives is needed – if indeed it is possible. The starting point should be planning for renewable capacity in a way that responds to environmental, energy, economic and social needs.

...Recent research has highlighted how electricity demand from data centres in Ireland has increased rapidly since 2015, compared to other sectors, and that, by 2030, data-centre demand could surpass that of the country's entire industrial sector (Daly, 2024).That research also states that all additional wind energy since 2017 has been absorbed by data centres, negating fossil-fuel reductions. It points to a reliance by some data centres on on-site natural gas. That analysis concludes that a robust national strategy is needed to align economic growth with climate commitments, prioritising renewable energy deployment....

Climate Action Plan 2025

"The 2023–2050 EPA Projections Report indicates that while annual emissions are reducing for the first carbon budget period, mitigation will be insufficient."

"The 22% reduction in emissions in the electricity sector is due to an increase in the share of renewable electricity generation... and... a reduction in the use of coal-, oil-, and gas-fired plant for domestic generation".

"Reduce fossil fuel demand through energy efficiency measures in industry" with: "Reduce by 7%" [2025] and "Reduce by 10%" [2030].

Climate Action Plan 2024:

DECC will assess whether mandated caps on any increase in fossil fuel demand by large energy users could be put in place from 2026.

[This raises important questions as to whether the assessment was carried out, what it concluded, whether it was provided to or considered by the CRU during the LEU process, why caps were not introduced, and whether the possibility of such caps was considered in developing the final connection policy.

"Ireland will reduce the fugitive methane emissions which arise from the production and transportation of fossil fuels, especially natural gas, by increasing renewable energy and decreasing the demand for fossil fuels."

'Notwithstanding the above, the scale of projected electricity demand growth means that the delivery and integration of the renewables programme alone does not deliver required levels of emissions reduction. Net Zero demand growth and calibrating renewable energy with demand will need to be pursued as a matter of urgency as a part of a longer-term decarbonisation pathway for the sector including for the third carbon budget.'

"To achieve these highly ambitious targets, we must significantly and urgently reduce the use of all fossil fuels (coal, natural gas, oil, and peat) and improve energy efficiency in our buildings."

"Reduce fossil fuel demand through energy efficiency measures in industry"

"Reduce natural gas demand and develop renewable, indigenous gas supply and renewable gas-compatible storage solutions

"Reduction of demand due to energy efficiency responses to mitigate reliance on fossil fuels"

"Reduce fossil fuel demand through energy efficiency measures in industry" "Reduce by 7%" [2025] and "Reduce by 10%" [2030].

Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction 2024

"To reduce reliance on gas imports, we will reduce natural gas demand and increase renewable indigenous gas supply, with renewable gas-compatible storage solutions."

"As Ireland decarbonises its energy system as part of achieving these commitments, demand for electricity will increase and total demand for natural gas will decrease."

"We know with certainty, however, that reaching climate neutrality will require Ireland's carbon dioxide emissions from fossil fuel energy use in power generation, heating, industry, and transport to reduce to effectively zero."

2030 industrial measures include: "increasing the share of carbon neutral heating in total fuel demand, … electrification of industry low to medium heating, measures to reduce energy demand reduction in industry and increasing the use of zero emission gas."

Annex 2 of Government's Energy Security Package - **Securing Ireland's Gas Supplies**

…Looking beyond 2030, MaREI Centre of University College Cork (UCC) have examined the role of natural gas in the energy transition consistent with Ireland's carbon budgets up to the period to 2050 across a number of scenarios. While uncertainties remain when forecasting trends, particularly beyond 2030 given the many variables that exist. Figure 3.1 below presents data for two scenarios from this study. The first scenario 'High demand' refers to strong growth in electricity demand and second scenario 'Lower demand', refers to high renewable electricity capacity and lower electricity demand growth. While it illustrates there may be varying level of natural gas demand in the early 2030s, a similar pattern is observed in terms of level of gas demand consumed in 2040 and 2050 period. Natural gas demand sees a significant reduction of between 68-78% from 2030 to 2040, depending on

the scenario considered. This demonstrates the significant reduction of natural gas use anticipated, reducing the reliance on imports during this period and its limited role in our energy system as we reach 2040.

Ireland's integrated National Energy and Climate Plan 2021-2030 July 2024

"Reduce natural gas demand and develop renewable, indigenous gas supply and renewable gas-compatible storage solutions"

"To reduce reliance on gas imports, we will reduce natural gas demand and develop renewable, indigenous gas supply and renewable gas-compatible storage."

The NECP's WEM and WAM scenarios indicate that natural-gas consumption is projected to decline. The WEM notes: *"Natural Gas ktoe 4,294 4,402 4,079 4,289 4,315 4,417 3,922 3,449 3,050 2,447 1,408 1,014" for 2021 through 2050. NECP, Tables 52 and 53, p. 375.*

National Biomethane Strategy 2024

"As fossil gas demand falls later this decade, the percentage of biomethane in the network will grow."

"Overall fossil gas demand in Ireland must reduce significantly by 2030 and continue to decline if Ireland is to meet its legally binding climate targets."

ICJ Advisory Opinion on the Obligations of States in Respect of Climate Change, 23 July 2025

Paragraph 427:

"...Failure of a State to take appropriate action to protect the climate system from GHG emissions — including through fossil fuel production, fossil fuel consumption, the granting of fossil fuel exploration licences or the provision of fossil fuel subsidies — may constitute an internationally wrongful act which is attributable to that State…."

Paragraph 428:

"....[A] State may be responsible where, for example, it has failed to exercise due diligence by not taking the necessary regulatory and legislative measures to limit the quantity of emissions caused by private actors under its jurisdiction."