Friends of the Earth

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Friends of the Earth Ireland

Policy Briefing on COP30

Introduction

This November in Belém, governments are gathering once more to further obligations agreed under the Paris Agreement. It is a chance for Ireland and the EU to demonstrate the credibility of their commitment to climate action and fossil fuel phase out, particularly in response to the catastrophic climate induced weather events which have only increased in frequency and intensity in the last year.

This year's summit is taking place under particularly challenging circumstances. The disappointing ambition and outcomes from COP29 in Baku, global reductions in development aid, renewed momentum behind climate denial, and concerning reversals of core EU environmental and climate policies all form a difficult backdrop. At the same time, COP30 will be the first summit since COP26 in Glasgow to be hosted in a democratic country whose government is actively seeking to strengthen its climate leadership.

COP30 represents a critical moment to change course and close the growing gaps in both emissions reductions, fossil fuel phase out and long-promised climate finance. It also marks a decade since the Paris Agreement was adopted. Countries are expected to submit updated national emissions reduction plans that will be central to determining whether the world can still limit global warming to 1.5°C. A credible pathway for scaling up and delivering climate finance to developing countries most affected by the crisis will also be essential.

This is the first COP since the current government took office and is an important test of Ireland's international climate leadership at a time when global cooperation on climate action faces mounting risks.

The principle of climate justice demands that states most responsible for the climate crisis, including Ireland, must do their fair share to reduce emissions. Climate justice also demands that rich, high emitting countries must provide climate finance to support climate mitigation and adaptation in developing countries and compensate for irreversible climate impacts that these countries are already suffering from. This principle informs the recommendations outlined below.

Key Recommendations

- Ireland and the EU must correct course by working together with other states to develop a robust and ambitious global response plan to address the significant climate ambition and implementation gaps, including a commitment to revise NDCs, particularly those of historically high emitters such as the EU.
- The EU's revised NDC should seek to achieve domestic net zero emissions by 2040 at the latest and a 2035 target of at least 94% net domestic emission reductions.

- The Irish Government should push the EU to utilise COP30 to declare its commitment to ending the use of coal by 2030, fossil gas by 2035, and oil by 2040. It should also call on the EU to reject fossil fuel lobbyists in delegations.
- Ireland should reject further fossil fuel developments, particularly LNG and data centres. It should also join small island states, the WHO, the European Parliament and thousands of other authorities by supporting calls for a negotiating mandate for a new Fossil Fuel Non Proliferation Treaty.
- The Irish government should push for a robust UNFCCC Accountability Framework to define and regulate conflicts of interest, ensuring that the integrity of international climate negotiations is upheld and that policy decisions prioritise the public interest over private profits.
- Ireland should reject the false solution of carbon markets, which fail to address the root causes of the climate crisis and enable corporations and high-emitting countries to greenwash their activities.
- Our government should advocate for an ambitious and clearly defined Baku-to-Belém Roadmap, with concrete targets, timelines, and transparent sources of funding, including new sources of public financing rooted in the polluter pays and social equity principles, such as climate-related taxation, wealth taxes and the redirection of fossil fuel subsidies.
- Ireland should work collaboratively to ensure human rights protection and the meaningful civil society participation at all COPs.

These recommendations are addressed in more detail below.

1) Address the collective shortfall in global climate action

The IPCC has made it clear: to limit warming to 1.5°C, global greenhouse gas emissions need to peak before 2025 and be cut by at least 43% by 2030 and 60% by 2035, compared to 2019 levels. Current pledges remain insufficient. The 2025 UN Emissions Gap Report concluded that existing policies will lead to an increase of 2.8°C by 2100, putting the world on a path to a "serious escalation of climate risks and damages"[1].

António Guterres, UN Secretary-General, has urged all countries yet to finalise their Nationally Determined Contributions (NDCs) to do so without delay, saying "COP30 in Brazil must conclude with a credible global response plan to get us on track." This round of NDCs will set the course for countries' updated 2030 targets and new 2035 ones. Both the scale and pace of the actions countries decide to take on climate in the next five years will determine whether the 1.5°C agenda can be kept alive.

In its 2025 Advisory Opinion[2], the International Court of Justice confirmed that limiting global warming to 1.5°C is the agreed objective of the Paris Agreement, and that states must shape their climate policies based on the best available science. This must be done in line with the principle of

[1] https://www.unep.org/resources/emissions-gap-report-2025

[2] Obligations of States in respect of Climate Change (Request for Advisory Opinion). Case No. 187. https://www.icj-cij.org/sites/default/files/case-related/187/187-20250723-adv-01-00-en.pdf

common but differentiated responsibilities and in recognition of the EU's historical responsibility for emissions.

The Court also clarified that simply submitting an NDC is not sufficient to meet the Paris Agreement obligations. The substance of the NDC matters: it must make a real and adequate contribution toward achieving the 1.5°C goal. While states retain some discretion in determining this contribution, they must consider fairness and ensure that their NDCs reflect the highest possible level of ambition. Additionally, the Court stressed that the duty to prevent significant harm to the climate system necessarily includes responsibility for fossil fuel production, consumption, and related infrastructure, thereby reinforcing commitments under the first Global Stocktake.

Despite this clear ruling, the UN Synthesis Report[3] of NDCs shows that, even with updated plans, countries' collective efforts would reduce greenhouse gas (GHG) emissions by just 17% below 2019 levels by 2035, far short of the 60% reduction required.

Unfortunately, the EU has put forward a weak and regressive NDC, featuring an emissions reduction target that falls short of its fair share. It also lacks a firm timeline for phasing out fossil fuels and allows the EU to purchase carbon credits from other countries to lower its own reduction requirements.

Ireland and the EU must now correct course by working together with other states to develop a robust and ambitious global response plan to address the significant ambition and implementation gaps, including a commitment to revise NDCs, particularly those of historically high emitters such as the EU. The EU's revised NDC should be guided by the principles of equity and Common But Differentiated Responsibilities and Respective Capabilities (CBDR-RC) and should be in line with a 1.5°C pathway.

As highlighted by our colleagues in CAN Europe[4], to do this the EU's revised NDC should seek to achieve domestic net zero emissions by 2040 at the latest and a 2035 target of at least 94% net domestic emission reductions. Failure to take rapid and meaningful action now will only incur far greater costs into the future.

2) Drive a rapid phaseout of fossil fuels

The continued use of fossil fuels is severely damaging the planet's ability to provide critical ecosystem services, including stable weather systems, clean air, fresh water, fertile soils, and biodiversity. By delaying the transition, we are not only locking ourselves into high-carbon pathways, risking trillions in stranded assets, but also causing irreversible damage to life-sustaining ecosystems and the people that depend on them. Authorities have already made clear that a commitment to the phaseout of polluting fossil fuels must be an imperative for all states. The International Energy Agency (IEA) has affirmed that there are no new oil and gas fields or coal mines, and no additional liquefied natural gas export infrastructure, under a 1.5°C pathway[5].

The COP 28 decision text called on all countries to contribute to a list of goals, including "transitioning away from fossil fuels". After nearly 30 years, this was the first time a COP decision had explicitly called out all fossil fuels. However, there was no reference made to the responsibility of rich countries to act first, failing to require decarbonisation efforts to be led by those responsible for the vast

[3] https://unfccc.int/sites/default/files/resource/cma2025_08.pdf

[4] https://caneurope.org/content/uploads/2025/10/2025.10.29-ENVI-Council-Letter-CAN-Europe-.pdf

[5] https://www.iea.org/reports/world-energy-outlook-2024

majority of historical emissions. There were also loopholes in the text regarding the use of gas, as well as false solutions like abatement and removal technologies such as carbon capture, utilisation and storage.

Despite COP28's unprecedented call to "transition away from fossil fuels in energy systems", there was no meaningful progress towards achieving this goal at COP29. In a world where fossil fuels contribute to over 75 per cent of global greenhouse gas emissions, this is simply not acceptable. Ireland and the EU must ensure that the phaseout of fossil fuels is not relegated to the sidelines of the negotiations.

At COP30, Ireland and the EU must be at the forefront in demanding phase out of fossil fuels, without caveats such as "unabated" fossil fuel phaseouts or the definition of gas as a "transition fuel". There must be an agreement to immediately halt all new fossil fuel projects, and a firm commitment to not rely on carbon Capture Usage and Storage (CCUS) technologies, which remain costly and unproven. Subsidies for fossil fuels should be cut by 2025 in a socially just manner and the move to 100% renewables should be accelerated with nature protection and community participation at its heart.

The Irish Government should push the EU to utilise COP30 to declare its commitment to ending the use of coal by 2030, fossil gas by 2035, and oil by 2040. The EU must also call on other major countries, including in the G7, to phase out all fossil fuel subsidies rapidly and achieve similar progress in the G20, avoiding qualifiers like "environmentally harmful" that dilute commitments.

Similarly, Ireland should advocate for the EU to lead by example by setting and meeting ambitious and binding energy goals: achieve at least 50% renewable energy and 20% energy savings by 2030, and reduce overall energy consumption by half within a fully renewable system by 2040. It should also prioritise cutting methane emissions, advocating for a binding global target of at least a 75% reduction by 2030, in line with a complete phase-out of fossil fuels.

The 2025 ICJ opinion is also instructive with regard to the need for fossil fuel phaseout, addressing that it is not only the climate law that governs state obligations regarding climate change. Human rights law, environmental law, and customary international law also apply. The ICJ Advisory Opinion outlined that states can be held accountable for actions/omissions of private actors (companies) under their jurisdiction. Failure to regulate or constrain the production or consumption of fossil fuels, or providing subsidies, could constitute a breach of international law. It notes: "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.....Thus, 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" (paras 427-428).

This conclusion is central to consideration of fossil fuel developments in Ireland and must be integrated into relevant policy-making. This is particularly the case in relation to Liquefied Natural Gas given that the Government is currently proceeding with the development of a state-owned strategic terminal (without having institutionalised climate conditions) while also allowing a standard commercial terminal to be considered in the Shannon estuary.

We call for an equitable phase out of fossil fuels that focuses on energy access for the poorest and the need to expand access to renewable energy. This is not a phaseout at any cost, but a phaseout that is fair and just, with less wealthy countries supported by finance from rich countries for their transitions.

3) Reject fossil fuel influence at COP30

Like previous climate summits, COP30 will host many participants whose agendas are fundamentally at odds with climate justice. Thousands of fossil fuel lobbyists, along with the heads of oil giants like Shell and BP, are expected to be in attendance.

The European Commission made the progressive decision to exclude fossil fuel executives from its official COP29 delegation. However, EU Member States still included more than 113 fossil fuel lobbyists in their national delegations[6]. If the EU truly intends to lead the global shift away from fossil fuels, it must take firm action to limit the industry's undue influence at COP30 and in future climate negotiations.

To safeguard the integrity of international negotiations, the Government should reject the inclusion of industry lobbyists in the Irish delegation to future COPs. Ireland and the EU should also push for a robust UNFCCC Accountability Framework[7] to define and regulate conflicts of interest, ensuring that the integrity of international climate negotiations is upheld and that policy decisions prioritise the public interest over private profits.

The Irish government should also advocate for the development of an EU-level conflict of interest policy to shield public policymaking from fossil fuel interference, aligning European governance with the ambition and urgency of its climate goals.

While we don't believe Ireland has not included significant fossil fuel lobbyists as part of its delegation, entries in the Irish lobby register indicate the oversized influence of industry, particularly the gas and data centre industries, on climate policy discussions. We are particularly alarmed that in certain instances it is semi-states closest to these industries which appear to be leading on such lobbying activities.

4) Turn away from false solutions

The livestock lobby from Ireland and other countries are calling for a change in the way methane is accounted in the greenhouse gas inventory based on a "split gas" approach .[8] Ireland should publicly reject such recommendations. It carries significant risk of reputational damage to Ireland internationally. It also distorts accountability, undermines global equity, and threatens climate justice by rewarding high emitters. effectively allowing for high methane emissions, fragmenting reporting, reducing transparency, and slowing collective climate action. It ignores scientific consensus, including from the IPCC and UNEP, that has confirmed that deep methane cuts by 2030–2040 are essential to limit temperature overshoot and meet the 1.5°C goal. A major study led by University of Galway has also rejected this approach. [9]It redefines the goal of climate action as simply stabilising the warming impact of emissions from any given source at current levels – rather than seeking to "minimise all

[6] https://fossilfreepolitics.org/news/europe-brings-gas-lobbyists-to-cop29-to-strike-deals/

[7] https://corporateaccountability.org/wp-content/uploads/2022/08/Joint-civil-society-submission-on-COI-Aug-17-2022_.pdf

[8]https://www.farmersguardian.com/news/4521064/farming-organisations-demand-fix-inaccurate-emissions-accounting-overstates-agricultures-climate-impact

[9] Colm Duffy et al 2025 Environ. Res. Lett. 20 094019 https://iopscience.iop.org/article/10.1088/1748-9326/adf12d

greenhouse gas emissions" and their contribution to global warming. [10]A split gas approach also risks shifting the climate burden onto developing nations with historically lower emissions.[11]

With the gavelling through of Article 6 in Baku, the global carbon market under the UNFCCC has now been fully operationalised. Article 6.4 of the Paris Agreement covers the global carbon market and Article 6.2 covers bilateral, regional and other international market approaches.

A number of investigations[12] have shown that carbon markets and offsets don't work, and instead harm our communities and environment. In 2023, the scandal around the world's leading carbon offset certifier Verra showed that over 90% of the offsets it sold were largely worthless[13]. To put it simply: carbon markets, carbon credits and offsets simply do not achieve real emission reductions. The remaining global carbon budget allows for a decade or likely even less of emissions. There is no time for offsetting.

However, there is an increasing danger that the world will opt for shortcuts instead of genuine solutions. The Brazilian Presidency has expressed strong backing for measures such as carbon markets and new financial mechanisms that may appear promising, but in reality pose serious risks to people and the planet. These false solutions fail to address the root causes of the climate crisis. Instead, they enable corporations and high-emitting countries to greenwash their activities while further concentrating land, wealth, and power in the hands of the few. It is essential that Ireland and the EU stand up for real solutions such as adequate climate finance and a rapid fossil fuel phaseout, and reject the dead end of false solutions.

5) Pay our climate finance debt

In addition to points made below, we fully support the detailed recommendations put forward by our fellow Stop Climate Chaos Coalition members Trócaire and Christian Aid.

We draw particular attention to Trócaire's recommendations that the Government should:

- announce new grant-based climate finance pledges to ensure it meets its fair share of climate finance commitments, with funding that is new and additional to overseas development assistance.
- make an extra pledge to the Fund for Responding to Loss and Damage as part of a pathway to provide at least €1.5 billion by 2030.
- use its influence within the European Union to encourage the EU to make its initial pledge to the Fund for Responding to Loss and Damage and to ensure that this commitment is promptly paid in full.

At COP30, the Irish government should build on these domestic actions by advocating for a strong, equitable, and predictable climate finance framework that rectifies the major shortcomings of COP29, where outcomes fell far short of what is required. Current targets under the New Collective Quantified Goal (NCQG) of at least $300 billion annually for developing countries by 2035 and $1.3

[10] https://biogenicmethane.org/

[11] https://www.greenpeace.org/aotearoa/publication/briefing-the-methane-threat-to-1-5c-and-no-additional-warming

[12] https://www.foei.org/wp-content/uploads/2023/11/Bank-of-evidence-climate-false-solutions_EN_Nov-2023.pdf

[13] https://www.theguardian.com/environment/2015/jan/15/rate-of-environmental-degradation-puts-life-on-earth-at-risk-say-scientists

trillion overall remain deeply inadequate given the scale of global needs. Ireland and the EU should call for finance that is public, new and additional, non-debt creating, and predictable, ensuring resources are available for mitigation, adaptation, loss and damage, and just transition efforts.

Our government should emphasise that climate finance must be based on fairness, transparency, and accountability, channelled through democratic mechanisms rather than private or profit-driven models. It should resist the growing reliance on carbon markets and blended finance that risk deepening inequalities and debt burdens in the Global South. Finance must enable technology transfer, capacity building, and equitable access to clean energy and sustainable development opportunities.

Ireland should also advocate for an ambitious and clearly defined Baku-to-Belém Roadmap, with concrete targets, timelines, and transparent sources of funding, including new sources of public financing rooted in the polluter pays and social equity principles, such as climate-related taxation, wealth taxes and the redirection of fossil fuel subsidies. Strengthening the Green Climate Fund and the Fund for Responding to Loss and Damage should be a priority, with clear commitments to deliver on existing pledges.

Finally, the Irish government should support debt cancellation for vulnerable countries and call out the Global North's ongoing failure to meet its climate finance responsibilities. By taking a principled and ambitious stance, Ireland can help drive a finance outcome at COP30 that is just, transparent, and sufficient to empower developing countries in their transition to low-carbon, climate-resilient futures.

6) Commit to other diplomatic avenues, such as a Fossil Fuel Non-Proliferation Treaty

There are other diplomatic avenues which the Government should exploit to exert pressure and deliver an urgent phase out of fossil fuels. Friends of the Earth has argued for the endorsement of the Fossil Fuel-Proliferation Treaty initiative, as Ireland's support would be relevant, appropriate and strategic.

In December 2023, the Dáil debated and passed a motion from Deputy Pringle which urged the Government to strengthen its approach to divestment from fossil fuels and support the recommendation for Ireland to endorse the development of the Treaty.[14]
We would underline that no Treaty text yet exists - a political endorsement of a proposed idea to develop such a treaty is a significantly lower-bar ask than securing the state's legal entry into an existing new international agreement.

Ireland is ideally placed to support the process of getting the proposed treaty initiative onto the diplomatic and UN agenda given its commitment to climate action, rejection of further offshore exploration licences and its membership of the Beyond Oil and Gas Alliance diplomatic initiative.

Our Department of Foreign Affairs also has significant expertise and a proud tradition of leading the international agenda on other non-proliferation treaties related to nuclear weapons and disarmament. In the past decade Ireland has also aligned with and supported small island states at the UN, many of whom are now seeking Ireland's support in seeking a negotiating mandate for this new fossil fuel treaty.

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14 https://www.friendsoftheearth.ie/news/friends-of-the-earth-action-aid-and-trocaire-welcomes-the-su/

There is a need for a coherent and equitable approach to preventing emissions at source and a coordinated just transition globally. It also remains highly uncertain that fossil fuel producing states will ever permit Paris Agreement mechanisms to fully support science-aligned phase out targets.

Therefore, we are now calling on Ireland to join small island states, the WHO, the European Parliament and thousands of other authorities and support calls for a negotiating mandate for a new fossil fuel treaty.

This is not about deprioritising the Paris Agreement, it is about complementing it and acknowledging that we simply do not have time: new fossil fuel projects are still being approved, threatening both survival limits set down in the Paris Agreement. New international legal avenues are necessary.

7) Deliver a Just Transition Mechanism

At COP30, Ireland and the EU should strongly support the establishment of an International Mechanism for Just Transition to accelerate equitable, holistic transitions across all sectors and countries. Such a mechanism should operationalise equity and the principles of Common But Differentiated Responsibilities and Respective Capabilities (CBDR-RC), enabling collective progress toward the Paris Agreement's long-term goals. It should facilitate a full, fair, and just transition away from fossil fuels, promote sustainable agriculture and industrial processes, ensure inclusive and equitable deployment of renewable energies with a focus on energy access, and manage ecosystems and natural resources responsibly, including supply chains for transition minerals.

Ireland should champion a comprehensive set of principles, safeguards, and an international action plan for Just Transition that is transformational, rights-based, and aligned with the Paris Agreement, centering the rights of workers, women, Indigenous Peoples, youth, and marginalised communities. Just Transition strategies must be integrated into Nationally Determined Contributions (NDCs) and National Adaptation Plans (NAPs), supported by new, additional, predictable, and non-debt-creating climate finance, as well as international cooperation on technology transfer, capacity building, and structural reforms of the financial system.

Ireland should back strong fossil fuel phaseout language that is fully funded and equitable, ensuring energy access for the Global South while avoiding extractive or exploitative renewable energy models. This approach must prioritise community and public ownership of energy, address energy poverty, and link phaseout measures to the means of implementation for developing countries.

At a minimum, the Irish government should advocate for the continued mandate of the Just Transition Work Programme beyond 2026, while supporting ambitious civil society demands for an institutionalised mechanism that addresses all dimensions of transition, including agriculture, energy, and transition minerals, and operationalises national Just Transition frameworks.

8) Ensure human rights protection

There is no climate justice without human rights. Ireland and the EU must lead in ensuring human rights are safeguarded within international, regional, and national climate processes; and must fight to ensure civil society and frontline communities can meaningfully participate.

Independent monitoring of transnational climate governance by civil society is not a 'nice to have'- it is intrinsic to the success of the UNFCCC process, and should not be subjugated to private interests,

harassment, or intimidation. Furthermore, local activists should be protected from harm, including in COP host countries.

Additionally, international human rights and strong environmental safeguards should be central considerations for Ireland and the EU when signing or implementing bilateral agreements (e.g. on climate and energy) with third countries.