

Ireland's Long-term Strategy on Greenhouse Gas Emissions Reductions (2024): An Inadequate Roadmap for a Sustainable and Equitable Future

*This paper outlines Environmental Justice Network Ireland's initial response to Ireland's Long-term Strategy on Greenhouse Gas Emissions Reductions (2024). The Strategy was published June 26th, 2024.¹

Introduction

The Regulation on the Governance of the Energy Union and Climate Action (EU/2018/1999) establishes a framework for Member States to develop and submit their long-term strategies for reducing greenhouse gas emissions. These strategies are required to outline how each country will contribute to the EU's climate objectives, aligning with the Paris Agreement. Member States must update these strategies every ten years to reflect progress, incorporate new data, and adjust policies as needed to ensure continued alignment with long-term climate goals. Article 15.4 of the Regulation specifies that the LTS should include:

- Reductions in overall greenhouse gas emissions and improvements in carbon sinks.
- Sector-specific emission reductions and sink enhancements, including electricity, industry, transport, heating and cooling/buildings (residential and tertiary), agriculture, waste, and the land use, land use change and forestry sector (LULUCF).
- Expected progress on transition to a low greenhouse gas emission economy (incl. GHG intensity, the CO₂ intensity of GDP, related estimates of the long-term investment required, and strategies for related research, development and innovation).
- A socio-economic impact assessment of decarbonisation efforts, including macro-economic and social progress, health risks and benefits, and environmental protection.
- Connections to other national strategic goals, planning frameworks, policies and financial strategies.

National LTSs should connect with broader national objectives and policy measures, including Member States' NECPs (which focus on policy details and impacts until 2030). They are required to be complementary, with the overarching aim of climate neutrality serving as direction points for these mid- and long-term planning tools. It is broadly agreed that long-term strategies are fundamental to national climate frameworks, playing a critical role in enhancing ambition over time, ensuring policy stability, and signalling political commitment to achieving carbon neutrality.

¹ Department of the Environment, Climate and Communications. (2024). *Ireland's Long-term Strategy on Greenhouse Gas Emissions Reductions*. Available at: <https://assets.gov.ie/297131/ad1847e4-b9d7-4643-a01b-04ce9586e121.pdf>. Accessed 1st July 2024.

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Environmental Justice Network Ireland (EJNI) has prepared several resource documents and submissions on the nLTS throughout 2023, as well as engaging with Government officials on the process and informing the relevant Minister of the requirements for the nLTS under the Climate Action and Low Carbon Development (Amendment) Act 2021.² EJNI resources also include an assessment of the initial nLTS (published in 2023) which showed that the Strategy did not provide sufficient detail to be in line with the requirements of the Act.³ Building on these efforts, this paper outlines EJNI's response to Ireland's updated National Long-term Strategy, published in June 2024.

Ireland's national Long-term Strategy on Greenhouse Gas Emissions Reductions

Ireland's first national Long-Term Strategy (nLTS) was due by January 1, 2020. After missing this deadline by over three years, the European Commission opened an infringement case against Ireland. This case was closed 15 months later once the nLTS was submitted in 2023. Despite the delay, the document did not adequately reflect much of Ireland's existing climate legislation. According to the Governance Regulation, an updated version is required to be resubmitted by January 1, 2025. This update aims to incorporate recent legislative changes and better align with Ireland's climate goals.

The nLTS is not only a statutory requirement to fulfil Ireland's obligations to the European Commission under the (2018) Governance Regulation (Article 15.1) but is also a fundamental element of Ireland's national strategy for climate mitigation leading up to the year 2050. Ireland published its nLTS on 26th June 2024, an update of the Strategy published in 2023. It is presumed this is the update as required by the Governance Regulation.

The nLTS overlooks the necessity for significant near-term emission reductions

In its submission to the consultation on the nLTS, EJNI echoed the Climate Change Advisory Council's call on the government to identify, quantify and implement very substantial new measures both in the updated Climate Action Plan and in the LTS, to close a worrying and significant emissions gap.⁴ These concerns have not been addressed in the updated nLTS.

The nLTS inaccurately and misleadingly misrepresents and undermines the 2030 and 2050 target definitions established in the Climate Action and Low Carbon Development (Amendment) Act 2021 and interpreted by the Climate Change Advisory Council (which supports the national carbon budgeting programme). Contrary

² See: Orla Kelleher and Clodagh Daly (2023) 'Consultation Response: Ireland's National Long Term Strategy' Environmental Justice Network Ireland and Community Law and Mediation Briefing Paper. Available at: <https://ejni.net/wp-content/uploads/2023/06/EJNI-and-CLM-Consultation-Response-on-Irelands-National-Long-Term-Strategy.pdf> . Accessed 15 June 2023.

Orla Kelleher, 'Is Ireland's national long term strategy (nLTS) sufficiently detailed?' EJNI Briefing Paper, May 2023. Available at: <https://ejni.net/wp-content/uploads/2023/05/EJNI-Briefing-on-Irelands-nLTS.pdf>. Accessed 15 June 2023.

³ Orla Kelleher (May 2023). See footnote 2.

⁴ Kelleher and Daly (2023). See footnote 2.

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to the Paris Agreement's commitment to increase ambition over time, the nLTS effectively allows for a decrease in ambition compared to the Act.

It is the two five-year (tCO₂e) tonnage carbon budgets to 2030 (Budget 1 and Budget 2) that are legally binding. The Act's reference to 51% emissions reductions by 2030 only serves as a guideline for the Council's initial provision of the first two carbon budgets to 2030. Given significant emissions overshoot to date, even with full achievement of policy and measures under the Climate Action Plan 2024, the Environmental Protection Agency has projected exceedance of the first carbon budget (2021–2025) by 19 million tonnes CO₂ equivalent (19 MtCO₂e).⁵ Under the Act, this exceedance requires a matching reduction in the second carbon budget (2026–2030). This already means that a linear path to meeting the second budget is now likely to require a 69% cut by 2030 relative to 2018. Thus, the nLTS continued references to the 51% guideline are misleading because it underestimates the immediate urgency of policy correction and public investment to achieve earlier and deeper emissions reduction now.

The nLTS cites the Climate Change Advisory Council's 2021 report on Annual Average Percentage Change in Emissions for Budget 1 and Budget 2 as -4.80% and -8.30% (the Council averages for these budgets).⁶ However, taking into account current projections for Budget 1 and Budget 2, these figures are now outdated and cannot be used to inform policy making for this decade. As of early 2024, the annual reduction rate needed to reach Budget 1 is likely greater than -15% per year. The nLTS does not mention the current trajectory toward exceedance of Budget 1 and the consequent emissions reductions required for Budget 2. In relation to the unallocated economy-wide emissions savings, an assessment as to how these could be addressed is delayed until Quarter 1, 2025. There are serious implications because of this delay; key strategies for emission reductions will not be developed or delivered in time, hindering progress towards closing the significant emissions gap that now exists.

While the Strategy acknowledges the potential collapse of the Atlantic Meridional Overturning Circulation, tipping points, and the need for targeted research to inform policy development, it fails to emphasise the already apparent need for urgent course correction to stay within its first carbon budget and prevent overshoot.

⁵ In its 2024 Projections report, the EPA finds that even with the implementation of all existing planned policies and measures under the WEM and WAM scenarios, Ireland will significantly miss the 2030 EU Emission Sharing Regulation (ESR) target and the legally binding national carbon budgets set by the Oireachtas under the Climate Act (2021 amendment): 295 MtCO₂e for Budget 1 (2021-2025) and 200 MtCO₂e for Budget 2 (2026-2030). Any exceedance of a five-year budget must be carried over, reducing the next period's budget. See: Environmental Protection Agency. "Ireland's Greenhouse Gas Emissions Projections 2023-2050." EPA, May 2024, Available at: <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-Report-2022-2050-May24--v2.pdf>. Accessed 1st July 2024.

⁶ Climate Change Advisory Council. (2021). *Technical report on carbon budgets*. Available at: <https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/Technical%20report%20on%20carbon%20budgets%2025.10.2021.pdf>. Accessed 1st July 2024.

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The nLTS fails to pledge an accelerated decarbonisation timeline in line with climate justice responsibilities

The nLTS is not only a statutory requirement to fulfil Ireland's obligations to the European Commission under the (2018) Governance Regulation (Article 15.1) but is also a fundamental element of Ireland's national strategy for climate mitigation leading up to the year 2050. The Climate Act (2021) designates specific responsibilities to the Department for Energy, Climate and Communications for the development and ratification of a 'long-term climate action strategy'. Section 3(3) of the Act mandates that both the Minister and the Government, in their climate planning, adhere to the provisions of Article 2 of the UNFCCC, the EU's climate obligations, and Articles 2 and 4(1) of the Paris Agreement. In broad terms, this requires demonstrating the strategy's alignment with the 1.5°C/well below 2°C temperature goal, as well as with climate justice principles of equity and common but differentiated responsibilities and respective capacities (CBDRRC) that underpin these temperature goals. The nLTS must therefore meet the targets of limiting global temperature increases to 1.5°C and embody the principles of climate justice, equity and the principle of common but differentiated responsibilities.

The nLTS does not prioritise these legal requirements. As emphasised in the EJNI/CLM submission to the consultation on the nLTS (mid-2023), in aligning with Section 3(3) and the Paris Agreement, the Government needed to leverage the nLTS update as a key moment to pledge to an accelerated decarbonization timeline, aiming for no later than 2040, and to pursue net negative emissions subsequently.⁷ An advanced decarbonisation deadline may be especially necessary due to the likely exceedance of Ireland's carbon budgets for this decade (as outlined earlier).⁸

The Climate Change Advisory Council's 2021 Carbon Budget Technical Report interprets the Act as requiring Ireland to limit emissions to its fair share of keeping global heating to 1.5°C above pre-industrial levels by 2050, as per Article 2.⁹ Recent analysis of the Council's methodology, published in a peer-reviewed journal, reveals that the Council's carbon budgeting programme necessitates an initial climate neutrality objective – in Article 4(1) terms – by 2035 at the latest – not 2050, as the nLTS suggests.¹⁰ This initial "net zero" climate neutrality will significantly overshoot the Council's stated 1.5°C fair share threshold, making it not compliant.

Moreover, McMullin et al. (2024) indicate that for Ireland to meet an objective aligned with Article 2 by 2050, per the Council's stated 1.5°C fair share threshold, significant early, substantial, and sustained reductions in agricultural methane emissions are necessary – around 40% or more by 2030. This must be coupled with significant reductions in carbon dioxide emissions from fossil fuels, industrial processes, and land

⁷ Kelleher and Daly (2023). See footnote 2.

⁸ EJNI, along with other environmental networks, have emphasised that the nLTS needs to be revised to include quantified measures demonstrating how Ireland will achieve complete decarbonisation across all sectors, including aviation and shipping, well before 2050, with the land-use sector reaching net zero emissions even sooner.

⁹ Climate Change Advisory Council. (2021). *Technical report on carbon budgets*. Available at: <https://www.climatecouncil.ie/media/climatechangeadvisorycouncil/Technical%20report%20on%20carbon%20budgets%2025.10.2021.pdf>. Accessed 1 July 2024.

¹⁰ Barry McMullin et al 2024 *Environ. Res. Lett.* 19 041006. Available at: <https://iopscience.iop.org/article/10.1088/1748-9326/ad3660>. Accessed 1 July 2024.

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use to achieve net zero by 2050. Additionally, early investment in achieving limited carbon dioxide removal after 2040 is crucial.

The nLTS's emphasis on "being climate neutral by no later than 2050" only targets a point that overshoots the fair share 1.5°C temperature target level. This approach risks delaying the urgent precautionary actions needed for rapid early emissions reductions. Early action and investment are essential to ensure a just transition, limit peak overshoot beyond the fair share 1.5°C temperature target, and facilitate an early return to this target in alignment with Ireland's commitment to global climate justice.

The nLTS lacks clarity on the balance between emissions reductions and removals

The nLTS fails to address the concerns raised in the EJNI/CLM submission (2023) regarding the reliance on negative emissions technologies and removals to reduce emissions and deal with unallocated savings. Numerous feasibility and sustainability constraints exist related to the widespread implementation of negative emissions technologies.¹¹ There is a danger that GHG removals might be seen as a replacement for, rather than a supplement to, immediate and significant emission reductions. An over reliance on GHG removals presents risks such as carbon leakage, land competition, and the fact that many technologies are still not scalable. It is because of these risks that separate targets for emissions reductions and GHG removals are advocated for, in addition to the urgent need for more ambitious, near-term emission reductions.

The nLTS primarily offers qualitative rather than quantitative details about Ireland's decarbonisation pathway to 2050, leaving the balance between reliance on removals and emission reductions unclear. In its 2023 submission to the nLTS consultation, EJNI and CLM urged the Government to learn from other Member States, such as the Netherlands, and include a minimum target for achieving net-zero through actual emission reductions. Considering a 95% emission reduction as an ambitious benchmark, CLM and EJNI called on the Government to commit to at least a 95% reduction in emissions by 2035 relative to 1990 levels. They also recommended revising the Climate Act to legally enshrine this commitment. These recommendations have not been addressed in the updated nLTS.

The nLTS does not adequately address energy security in line with climate security

In our submission to the nLTS consultation, it was recommended that the nLTS be revised to detail how Ireland's energy system will be transitioned in a way that is fast and fair, provides energy security, delivers public value, and social and ecological benefit. These priorities and recommendations remain insufficiently addressed in the updated nLTS. For example, the nLTS does not specify a phase-out date for the importation or production of fossil fuels. It considers the use of 'zero-emissions gas/bioenergy' (such as biogas and biomethane), but fails to acknowledge or address the feasibility concerns of alternative gases like biomethane in achieving decarbonisation goals. The nLTS also fails to adequately address one of the major drivers of energy demand in Ireland: data centres. Required is an enhanced regulatory regime, and more

¹¹ IPCC. (2022). *Climate Change 2022: Mitigation of Climate Change*. Summary for Policymakers. Available at: https://www.ipcc.ch/site/assets/uploads/sites/2/2022/06/SPM_version_report_LR.pdf. Accessed 1st July 2024.

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concrete details and transparency on if and how data centres can be managed sustainably, in a way that supports Ireland's climate commitments and aligns with the achievement of sectoral emissions ceilings.

Also absent is a clear roadmap for the electricity sector that details the necessary choices, such as fuel mix and grid infrastructure, needed for rapid decarbonisation. Furthermore, the role of hydrogen in Ireland's energy future remains undefined. The nLTS should have provided more clarity on how hydrogen will integrate with other elements of Ireland's broader decarbonisation strategy through 2050.

Fossil fuel subsidies receive no attention in the nLTS. This is despite calls for the updated nLTS to include a timeline for fossil fuel subsidy phase out whilst ensuring adequate access to affordable energy for all.¹² Finally, the continued development, expansion, and operation of fossil fuels and related assets are incompatible with Ireland's legally binding climate targets. True energy security cannot be achieved without ensuring climate security. Therefore, planned energy infrastructure must align with Ireland's obligations under the Climate Act. To comply with the Climate Act and the Paris Agreement, Ireland must urgently reduce fossil fuel use, reject further fossil fuel infrastructure, and plan for the decommissioning and identification of stranded assets. This sense of urgency is not reflected in the nLTS.

Consistency between Ireland's National Energy and Climate Plan (NECP) and the nLTS

The nLTS was published just one day before the public consultation on Ireland's updated National Energy and Climate Plan concluded. This allowed no time for stakeholders to review the level of consistency between both documents. It is noted in the nLTS that it will "build on the targets, policies, measures and actions we [the Government] have already committed to in the period to 2030 as set out in successive annual national Climate Action Plans and our EU National Energy and Climate Plans."

The nLTS and the NECP align insofar as they both rely on the Climate Action Plan 2024. However, this does not mean that as combined strategies, they are fully consistent with Ireland's climate commitments. Our assessment of the NECP concluded that because of its reliance on the Climate Action Plan 2024, it fails to comply with national carbon budgets and the EU's Annual Emission Allocation totals. Basing the final NECP on the CAP24 goes nowhere to ensuring near-term and consistent reductions in line with national and EU 2030 targets, and significantly increases the likelihood of much more erroneous, costly, and disruptive reductions post-2030.¹³ Given that both documents do not align with the requirements of the Governance Regulation and domestic law, it is impossible to assess the extent to which they are consistent with each other within the context of legal requirements.

¹² Kelleher and Daly (2023). See Footnote no. 2.

¹³ Catherine Devitt, Alison Hough, Caitlin McIlhennon, Paul Price, Vanessa Conroy, Collette McEntree, and Ciara Brennan 'Assessment of Ireland's Final Draft National Energy and Climate Plan: A missed opportunity to deliver faster and fairer climate action?' June 2024. Available at: <https://ejni.net/wp-content/uploads/2024/06/Assessment-of-Irelands-final-draft-NECP.pdf>. Accessed 2nd July 2024.

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The nLTS fails to outline a credible roadmap for the agriculture sector that is aligned with Ireland's climate commitments

Given the significant GHG emissions from the agricultural and LULUCF sectors, achieving economy-wide climate neutrality will require a bold shift from Ireland's predominantly livestock farming systems towards mixed farming, agroforestry, horticulture, forestry, and improved soil management, including rewetting organic soils. Removals under LULUCF should not be exclusively counted towards agricultural emissions.

The nLTS fails to provide a clear pathway for the sector consistent with Ireland's near- and long-term climate and environmental goals. Most policies focus on carbon sink removals, voluntary on-farm efficiency improvements (which have not significantly reduced emissions), 'further technologies', and 'research and development'. The nLTS also does not clearly outline the strengths and weaknesses of various mitigation options, the potential for methane reduction, the role of afforestation, or the impacts of policies on other objectives like biodiversity, just transition, and co-benefits such as improved air quality. Agricultural methane and N₂O emissions are insufficiently addressed, and the proposed measures are mistakenly portrayed as 'pursuing deep decarbonisation'.

It recognises that to achieve climate neutrality, the LULUCF sector will need to be developed into a net carbon sink in advance of 2050. However, absent is a detailed plan on how the national LULUCF target as per Regulation (EU) 2018/841, will be achieved, and comprehensive detail on the measures proposed post-2030 to ensure the sector remains as a carbon sink.

Early, deep, and sustained reductions in agricultural methane emissions are crucial for meeting Ireland's climate goals. However, minimal methane mitigation is projected to be achieved by the proposed technical measures, and there is a possibility that projected methane reductions may not be accepted under emissions accounting without strong verification. Overall, the Government should have adopted a precautionary policy in the nLTS to limit emissions-intensive milk and livestock production.¹⁴

The nLTS fails to address emissions from hard-to-abate sectors such as aviation and shipping

Even in regions with net zero pledges, there are some residual emissions in 2050, mainly in industry and transport. The Climate Change Advisory Council called on the Government to incorporate emissions in both the international marine and aviation sectors in its emissions profile over the period to 2050, and to provide greater clarity on the role of carbon capture and storage for difficult to decarbonise industry sub-sectors such as cement production. The nLTS does not set out how decarbonisation will work in these sectors, what mitigation and/or demand reduction measures will be deployed and how these sectors will be treated in the sectoral emissions ceilings as the carbon budget programme becomes even more stringent post-2030.

¹⁴ In their paper funded by the EU Legacy for Life programme, An Taisce outline the precautionary methane mitigation pathways for the agriculture sector to meet its emission ceilings set within Ireland's carbon budgets and aligned with the agreed EU Emission Sharing Regulation target. See: Price, P. (2024). Agricultural Methane in Irish Climate Action: greenhouse gas metrics, methane mitigation, and quantification of livestock numbers. Available at: <https://www.antaisce.org/Handlers/Download.ashx?IDMF=340fe15d-df75-45e9-86ba-341762616638>. Accessed 1st July 2024.

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