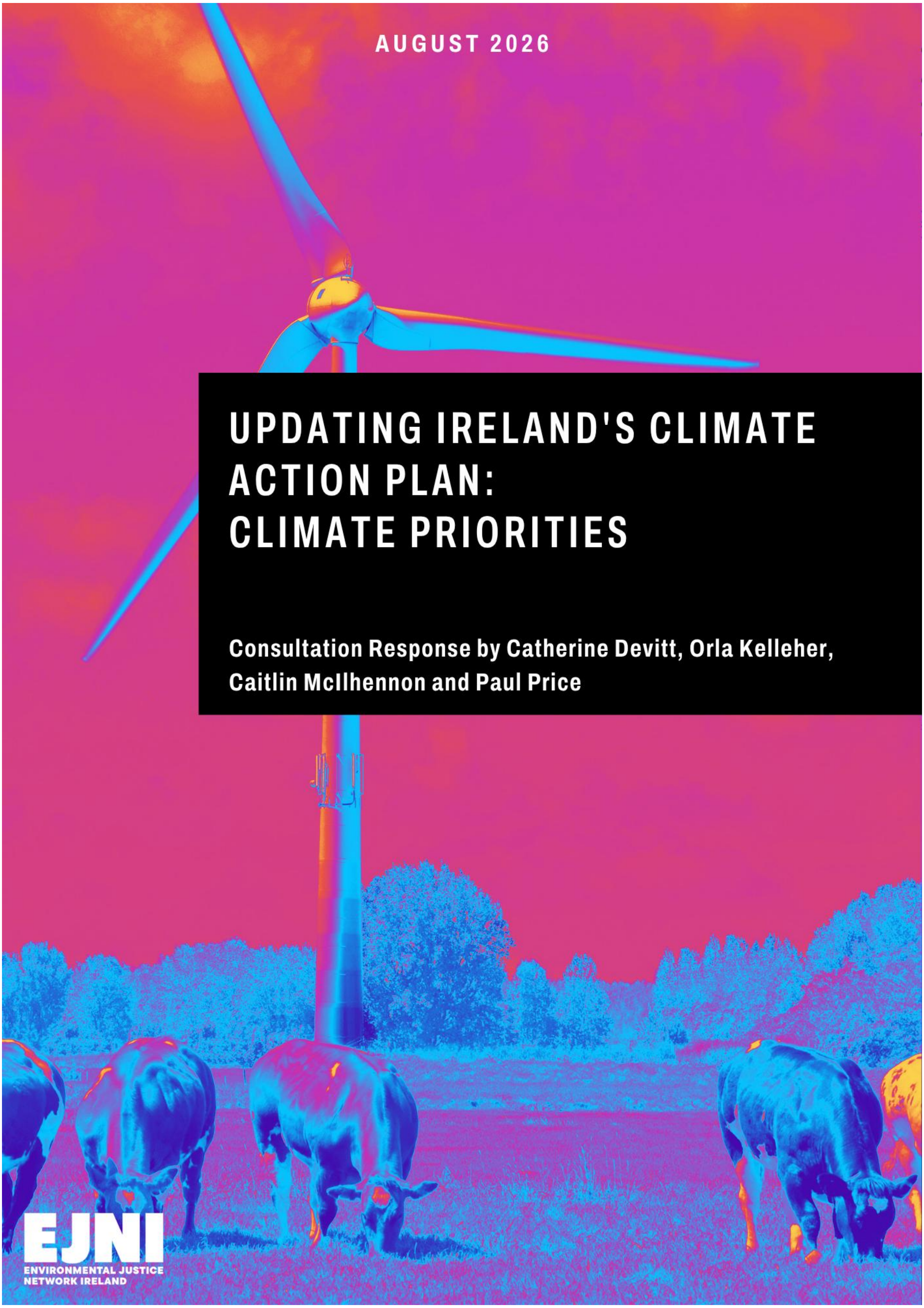
AUGUST 2026

UPDATING IRELAND'S CLIMATE ACTION PLAN: CLIMATE PRIORITIES

Consultation Response by Catherine Devitt, Orla Kelleher, Caitlin McIlhennon and Paul Price



EJNI
ENVIRONMENTAL JUSTICE NETWORK IRELAND

This document sets out the Environmental Justice Network Ireland's response to the Department of Climate, Energy, and the Environment's public consultation on the update to Ireland's Climate Action Plan, addressing Questions 1 to 7 as set out in the consultation portal.

Date of submission: 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?

The primary reason Ireland is close to meeting the agreed first carbon budget (CB1, 295 MtCO2e for 2021–2025) is a 19 MtCO2e windfall benefit following the EPA's scientific update of the base year 2018 value. As a result, 19 MtCO2e (around 40% of the original 46.5 Mt targeted reduction over 2021–2025 versus 2018) has been achieved via a non-policy accounting windfall rather than through any intentional climate policies or measures. The bulk of this windfall stems from a scientific reassessment of land use (LULUCF) sector emissions, with a smaller contribution from Agriculture following a reassessment of beef cattle feed intake and resulting methane and nitrous oxide emissions.

Moreover, emissions from net electricity imports are not counted in the territorial emissions inventory, and during 2021–2025 an increasing proportion of Ireland's electricity supply has come from net imports. This trend runs counter to past Climate Action Plan objectives of ensuring demand is met by domestic supply. Any analysis must note that this imported electricity would have emitted approximately 3.6 MtCO2 had it been generated in Ireland, based on SEAI national energy balance data and CCAC analysis.[1]

Given these substantial non-policy windfalls, alongside non-policy emissions reductions driven by major geopolitical events over the 2021–2025 period, including COVID-19, Russia's invasion of Ukraine, and US tariffs and the Iran conflict under the Trump administration, it is misleading to state simplistically that CB1 is close to being met due to policy achievement. The evidence set out above casts strong doubt on whether policy has had a substantial effect. Any assessment of policy success must first examine mitigation achievement within each individual sector and, crucially, attempt to separate out or at least identify non-policy effects from policy-driven ones.

CB1 was relatively easy to meet, requiring an average reduction of only 1.1 MtCO2e per year. Carbon Budget 2 is far more demanding, requiring an average reduction in total emissions of 5 MtCO2e per year. The EPA Projections find that Ireland is badly off-track toward meeting CB2, exceeding it by 52 MtCO2e, and is similarly far off track from its EU 2030 Effort Sharing Regulation target of a 42% reduction relative to 2005. This is due to insufficient progress in cutting transport and agriculture emissions.

The 2026 Carbon Market Watch report on EU member state mitigation policies found that Ireland presents a severe case of overreliance on carbon dioxide removal (CDR) to meet its 2030 targets. CDR technologies such as bioenergy with carbon capture and storage face multiple feasibility constraints in

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[1] 2025 continued the trend of significantly increasing net electricity imports above the long-term average. Electricity imports accounted for 17.3% (6,130 GWh) of supply in 2025, a 21% (1,069 GWh) annual increase, and are now over 23 times higher than the 0.8% (252 GWh) contribution in 2022."
This CCAC report notes that "emissions associated with electricity generation are accounted for in the territory where the electricity is generated, not where it is used (i.e. imported electricity has zero emissions associated with it for the purposes of national SEC [Sectoral Emission Ceiling] compliance)."

the short-to-medium term, and afforestation targets have been missed by a significant margin. At the same time, the Irish government has not quantified its expected residual emissions in 2050.

In October 2025, the Joint Committee on Climate, Environment and Energy, in its Report on the proposed Carbon Budgets, strongly recommended that Government not delay the introduction of stronger mitigation measures. To date it has failed to do so, and Climate Action Plan 2026's detailing of such measures is long overdue.

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?

Neither the 2024 nor the 2025 Climate Action Plan meets the requirement of the 2021 Climate Act to set out actions that cumulatively ensure both CB1 and CB2 will be met without fail. The With Additional Measures (WAM) scenario falls well short of the national carbon budget targets to 2030 and similarly fails to meet Ireland's EU Effort Sharing Regulation pathway and cumulative target. It should be remembered that the CCAC's 2021 'Paris Test' means that meeting the carbon budgets is only a minimum commitment to Ireland's climate justice obligations under the Paris Agreement.

At best, Government has a plan to fail in the 2024 and 2025 CAPs on which the EPA's assessments are based, but no plan to succeed in meeting the carbon budgets without fail. This is despite the Court of Appeal's confirmation, in the recent *Friends of the Irish Environment v Minister for the Environment* (Friends II) case, that measures in a Climate Action Plan must have a realistic evidential foundation and be capable of delivering the projected reductions if fully implemented.[2]

EJNI's highest priorities for closing the gap to 2030 are:

- **Set out specific, sector-by-sector actions** that cumulatively ensure the legally binding CB2 and provisional CB3 are met without fail, while also meeting the CCAC's Paris Test.
- **Allocate the 26 MtCO2e in "unallocated emissions savings"** set for the CB2 period among the Sectoral Emission Ceiling (SEC) sectors and define the as-yet-undefined SEC values for LULUCF. Without this clarity, the policy needed to meet CB2 without fail cannot be properly defined, and Government risks being seen as obfuscating climate action, with likely legal consequences.
- **Prioritise early and deep cuts in methane emissions**, primarily from beef and dairy cattle in Agriculture, alongside radical cuts in fossil fuel use. Independent analysis of the CCAC's 2024 scenario set found that only the deepest mitigation scenario meets the Paris Test, particularly urgent given Ireland's escalating overshoot of its 1.5°C fair share.
- **Target the sectors furthest off track.** As noted under Q1, sectoral percentage reductions relative to 2018 offer the clearest measure of achievement given the base-year reassessment. EJNI analysis for 2021–2025 shows only Buildings-Residential exceeded its target SEC (24% vs 20%), with Electricity close behind (38% vs 40%, though imported electricity emissions are excluded from the territorial inventory) and Industry and Other reaching about two-thirds of target. Three sectors fell far short: Agriculture (5% vs 10%), Buildings Commercial & Public (9% vs 20%), and Transport (6% vs 20%).

[2] The Court of Appeal dismissed the judicial review challenge to the 2023 CAP on the basis that the applicants had not provided sufficient expert evidence to demonstrate the Plan was inconsistent with the carbon budget; the judgment is currently under appeal to the Supreme Court. The Court nonetheless observed that measures proposed in a CAP must have "a real basis in current scientific and technical knowledge," cannot be purely speculative, and that measures for full implementation within the current carbon budget period must be more concrete and have a higher likelihood of implementation than those planned for later periods.

- **Direct additional measures at these lagging sectors:** Agriculture, Buildings-Commercial & Public, and Transport, to eliminate the 2021–2025 SEC exceedances, alongside meeting the 2026–2030 SECs as adjusted to reflect clear allocation of the 26 MtCO2e.
- **Submit Ireland's National Social Climate Plan without further delay.** It is now over a year late, and targeted support for less affluent households is essential to societal stability as the pace of mitigation increases.

Achieving the deep mitigation needed to meet the carbon budgets will also deliver far greater national and household resilience to fossil fuel price shocks, and increased food security.

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?

The most pressing climate action priority for government is to present a detailed National Social Climate Plan (SCP), to ensure an inequitable "green divide" does not deepen between more and less affluent households.[3] Without an effective SCP, accelerated sectoral mitigation to meet the legally binding carbon budgets is liable to be seriously slowed by societal inequalities and discord. Measures in the SCP must meet the Social Climate Fund Regulation and align with CAP actions.

Electricity: The new CRU Large Energy User Connection Policy conflicts with Ireland's climate, energy efficiency and fossil fuel phase-out commitments. EJNI recommends:

- Pause new large energy user connections, including data centres, until demand growth can be matched in full by additional, genuinely incremental renewable generation. Data centre demand has consistently outpaced new renewable supply and now competes with electrification for the same finite grid capacity. EJNI supports a moratorium until Government can show expansion will not raise household costs, displace capacity, or undermine climate targets.
- Invest in storage as an electrification enabler, currently under-addressed in grid and market design, and accelerate household demand flexibility by removing barriers to dynamic pricing and real-time metering.
- Reverse the disapplication of climate-law obligations for designated critical infrastructure, so grid reinforcement is guaranteed to serve electrification rather than other demand.
- Review and, where necessary, update Ireland's RED II Article 22(3) assessment of the barriers facing and potential of renewable energy communities, to reflect developments since publication, and use its findings to strengthen the Article 22(4) enabling framework.
- Protect energy communities' grid access as deployment accelerates, with connection capacity reserved for community-led projects under transparent queue rules.

Buildings-Residential: Retrofit and heat pump installation is off track for 2030 targets, with a "green divide" opening between rural/poorer and urban/affluent households. The CCAC's Annual Review on the Built Environment cautioned against reading recent emissions reductions as structural progress, given both residential and commercial buildings are projected to exceed their second sectoral emissions ceilings. EJNI recommends:

- Up-front, means-tested grants or zero-interest loans to remove cost barriers for disadvantaged households, delivered via trusted local authorities.

[3] This divide is already occurring. 2026 research found that adoption of sustainable technologies “is strongly concentrated in affluent, owner-occupied, and professionally employed communities.

- Publish the Energy Affordability Action Plan, now overdue, and open it to public consultation. Without an EAAP or SCP there is no clear pathway to a fair and equitable energy transition.
- Reject the proposed Renewable Heat Obligation for blending liquid biofuels or biomethane, which would lock in continued fossil price exposure and is unscientific and cost-inefficient once land-use impacts are included.

Agriculture and Land Use: CAP 2024 and 2025 continue to rely on the Teagasc Marginal Abatement Cost Curve, despite its evident failure to deliver sectoral reductions, as policy-driven dairy expansion has cancelled out voluntary technical measures. The only proven effective mechanism to translate farm-level efficiencies into national mitigation was the EU milk quota limit on production. EJNI recommends implementation of the Environmental Pillar's 12 recommendations for agricultural transition policy.

Transport: EJNI recommends the following, with a particular focus on transport justice:

- Adopt a national definition of "sufficient accessibility" to guide transport and spatial planning. Transport poverty is the absence of viable, affordable alternatives, not primarily a fuel price problem, particularly in rural, peri-urban and island areas.
- Target place-based interventions, including demand-responsive transport and reduced fares, at communities most affected, rather than a uniform national approach.
- Build local authority capacity to design and deliver sustainable transport strategies, since national ambition is currently running ahead of delivery capacity, as reflected in the Minister for Transport's confirmation that active travel project demand now exceeds available NTA funding.
- Ensure electrification of private transport does not substitute for investment in public and shared mobility. EV grants without a parallel shift-and-avoid programme leave rural non-drivers no better off and risk deepening transport inequality, given the CCAC's Annual Review 2026 finding that EV and home charging grants are more likely to be accessed by higher-income households, with ownership concentrated in Dublin and other affluent areas.

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?
Ireland is set to co-host the second Transitioning Away from Fossil Fuels (TAFF) Conference with Tuvalu in early 2027. The main conference will take place in Tuvalu, with a pre-conference meeting held in Ireland. The first conference, held in Santa Marta and co-hosted by Colombia and the Netherlands, announced three workstreams to bring forward to the next conference: developing national and regional roadmaps away from fossil fuels; reforming the financial system to better facilitate the transition; and addressing fossil-fuel-intensive trade.

Given that this update to the Climate Action Plan coincides with Ireland's co-hosting of the TAFF Conference, EJNI recommends the following:

- The update should focus on demonstrating leadership in transitioning away from fossil fuels. As Trócaire has previously highlighted, Ireland must act at home to lead credibly on the international stage. Ireland is not starting from a good place: over 79% of Ireland's energy requirements were met by fossil fuels last year, according to the SEAI.
- CAP26 should use the three TAFF workstreams as organising principles for Ireland's fossil fuel phase-out commitments, moving Ireland from laggard to leader. In line with the first workstream, Ireland could commit in CAP26 to producing a fossil fuel phase-out plan that reflects Ireland's fair share, includes just transition measures, is adequately funded, and has clear timelines, presented in draft form at the pre-conference meeting with opportunities for meaningful public participation to shape it. Ireland should also commit to emergency legislation halting further fossil fuel

expansion at home, including both State-led and commercial LNG; as Trócaire has aptly observed, "pursuing new fossil fuel infrastructure is nonsensical, and it neglects the needs and rights of current and future generations everywhere." The second and third workstreams could be reflected through enhanced climate finance commitments, accelerating Ireland's exit from Investor-State Dispute Settlement (ISDS) mechanisms, and using its climate diplomacy role at the TAFF Conference and COP to advance the Fossil Fuel Non-Proliferation Treaty.

- A weakness of previous Climate Action Plans has been inadequate transboundary environmental assessment and public consultation. The strength of policies and measures in the updated Plan will have significant knock-on impacts for citizens in Northern Ireland. The UN Special Rapporteur on Human Rights and the Environment, in the exit report from her recent visit to Ireland, noted that "coordination on transboundary issues can be difficult and compromise ongoing efforts to further protect the environment," and that Ireland "could further benefit from a greater utilisation and strengthening of existing treaty bodies such as the North-South Ministerial Council under the Belfast/Good Friday Agreement (1998), to develop consultation, co-operation and action within the island of Ireland" to address transboundary issues, among others.
- There is also a need for much better alignment between national climate planning documents, such as the annually updated Climate Action Plan, and EU climate planning documents, such as the National Energy and Climate Plan. This would enhance transparency and support more meaningful public participation. Better alignment could, for example, take the form of accessible briefing documents explaining how each annual Climate Action Plan update adopts corrective measures to close emissions gaps identified in the biennial NECP progress reports.

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?

In the **Report on Barriers to Achieving Climate Targets (2026-30),** the Committee's findings and recommendations (Nos. 1–26, pp. 22–25) omit the crucial importance of avoiding societal inequality barriers to meeting climate targets. A detailed and effective National Social Climate Plan is therefore essential to ensure fairness and targeted measures avoiding a 'green divide' between more and less affluent households.

The list of stakeholders engaged shows the Committee consulted industry representative bodies but, except on buildings, largely failed to engage expert academics and eNGOs who highlight climate targets and societal context. As a result, the report fails to show how its sectoral recommendations can be quantitatively aligned with meeting the carbon budgets and SECs without fail; too many points adopt industry stakeholder views without due attention to informed academic and eNGO analysis.

EJNI strongly agrees with the report's overriding view that "without timely ceilings and credible delivery pathways, Ireland risks missing its binding 2030 emissions targets." As per Point 1, there has been an extraordinary delay in Government reviewing the second carbon budget and sectoral emissions ceilings, and a failure to specify where the 26 $MtCO_2e$ in CB2 "unallocated savings" will come from. The Committee's earlier October 2025 Report on the proposed Carbon Budgets had already highlighted this delay, but a fully updated Climate Action Plan remains long overdue.

EJNI commentary on the report's main findings and recommendations:

- Points 2 and 3: The report questionably accepts expanding electricity demand for data centres and large energy users, despite this demand exceeding earlier projections and clearly violating related sectoral emission ceilings.
- Point 4: On planning, the report omits the Government's ongoing weakening of Section 15 of the Climate Act through unjustified disapplication in the Strategic Gas Reserve and Dublin Airport Passenger Capacity Bills, and its continued undermining of Aarhus Convention pillars, including increased legal fees for challenges to poor environmental law decisions.
- Point 5: EJNI agrees that far more in-depth public engagement and consultation is needed to address public concerns and advance major projects such as the North–South Interconnector.
- Points 9, 10, 13: On Agriculture, the report states only measures – incentives and subsidies – likely to perpetuate business-as-usual GHG-intensive dairy and livestock production rather than diversification away from it. Research including the MUSE project has found that Ireland's agricultural policies since 2010 have had serious negative impacts across all environmental indicators, with greenhouse gas and ammonia emissions significantly increasing contrary to national and global mitigation ambitions. Neither recent nor longer-term evidence suggests existing MACC measures will deliver the reductions targeted by the SEC; Agriculture has to date delivered only half of its 2021–2025 indicative reduction.
- Point 11: On forestry, the report omits that excess harvesting relative to past planting is projected by the EPA to dramatically increase annual forest land emissions from this year. As per MUSE Project research, delaying timber harvest is now an essential measure requiring urgent consideration to meet CB2 and CB3.
- Point 12: On biomethane, Government's own targets and Teagasc analysis show silage feedstock production for anaerobic digestion is at least 35 times less land-efficient than PV solar; field research also indicates methane leaks from AD plants are very likely to cancel out any climate benefit.
- Points 15–17: On transport, EJNI largely agrees with the report's findings, especially the need for greater prioritisation of public transport spending, including in rural areas.
- Points 23–26: On business and manufacturing, the report clearly identifies a lack of strategy and targeted measures to ensure energy transition.
- Points 27–30: On buildings, the report omits the problematic Renewable Heat Obligation, which would introduce supports for biofuels and biomethane in home heating, raising household costs and locking in continued fossil oil and gas boiler use contrary to research and CCAC advice. It also omits the need for targeted measures, including no-interest loans and information for less affluent households to retrofit and install heat pumps, as done in France and elsewhere. As recommended by the UK Climate Change Committee, rebalancing billing costs away from electricity and onto gas and oil would assist this transition.

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?

While the concept of a 'just transition' has been directly incorporated into Ireland's Climate Action and Low Carbon Development Act 2015 (as amended), EJNI analysis found the definition is weakly defined and supplemented only by a non-statutory 'national transition framework' outlined in the 2021 Climate Action Plan. Academic analysis of Ireland's obligations similarly found that 'the softly worded [obligation] combined with the abstract definitions of just transition, offer a lot of political leeway to [government] in how they fulfil these… requirements.' As a result, our research has found a real lack of integration of just transition principles across Ireland's climate adaptation and mitigation policies.

A positive development has been the establishment of the Just Transition Commission (JTC), which has helped operationalise Just Transition principles through evidence-based research and strategic recommendations, and plays a key role in engaging vulnerable communities and social partners directly – a key gap in Ireland's climate policymaking. However, the Commission's administrative rather than statutory basis raises concerns about Government's obligation to adopt and implement its recommendations. Recent developments in Ireland's climate policy signal a reluctance to pursue climate action and social progress in tandem, a core tenet of a genuinely fair transition, and "general" or vague incorporation of just transition principles is not enough.

Previous CAPs focused just transition planning on the transition away from commercial peat extraction in the Midlands, funded first through the National Just Transition Fund and then the EU's Just Transition Fund. While an important place-based initiative, academic analysis of the programme found that communities felt unheard and excluded from policies initially designed for them. Ireland's just transition policies are also significantly shaped by supranational obligations: EU Just Transition Fund support of €84.5 million addressed the socio-economic impacts of peat extraction's phase-out on workers, communities and local SMEs, but proposals for the EU's Multiannual Financial Framework (2028–2034), including phase-out of the Just Transition Fund, optional Territorial Just Transition Plans, and limited social safeguards, point to a weakening of the EU's capacity to deliver fairly. National drafting of Ireland's National and Regional Partnership Plan (NRPP), which will shape this funding, has not yet commenced, a Parliamentary Question confirmed in June, pending resolution of policy issues.

EJNI recommends the following to embed just transition principles into CAP26 and climate action more generally:

- Fully adopt the JTC's recommendations into the next Climate Action Plan, systematically applying just transition principles across all sectors, rather than relying solely on the regional Midlands approach, and publish the national framework of just transition indicators promised, but delayed, since CAP25. As the Commission highlights, JT principles should be embedded within the governance of climate action, supported by clear responsibilities, evidence and accountability.
- Apply the lessons of the Midlands programme, particularly on community participation, to the preparation of the NRPP, and assess the impact of the EU's long-term budget on Ireland's just transition delivery, providing far greater clarity on how just transition initiatives will be funded across sectors, including increased, sustained and ring-fenced multi-annual funding for social housing retrofit.
- Outline longer-term measures on energy affordability to help vulnerable households transition away from fossil fuel reliance for home heating (see Question 3), given that Ireland's failure to address the structural causes of energy poverty presents a serious barrier to a fair and just transition. As the CCAC has highlighted, "social housing retrofit is one of the clearest tests of delivery [of a fair transition]."

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?

Mitigation failure contributes to adaptation failure. In common with many other affluent countries, Ireland's failure to plan for sufficient mitigation is aligned with exceeding limits to future adaptation. By overshooting our fair share of the 1.5°C global carbon budget, Ireland has an outsize contribution to increasing climate impacts and adaptation costs for the poorest nations, particularly in the Global South. To ensure climate justice, these impacts must be explicitly addressed through increased funding to affected poorer countries.

Adaptation has consistently received less political attention and resources than mitigation. Local delivery of adaptation measures remains under-resourced. Of particular concern is the near-total failure to implement the Biodiversity Sectoral Adaptation Plan: the CCAC's 2025 Adaptation Scorecard ranked biodiversity 11th of 11 sectors, with "No progress/insufficient evidence" recorded across all three assessment categories, governance and resourcing, policy implementation, and risk and adaptive management, despite nature-based solutions being essential to reducing vulnerability to floods, heat, and coastal erosion. EJNI shares the view that adaptation should be framed as a justice, nature, and governance issue, and that CAP26 should include:

- Permanent, ring-fenced funding for adaptation in local authorities. The CCAC itself has recommended that Government provide annual defined funding to make climate action roles in local authorities and climate action regional offices permanent, alongside adequate and sustained central funding for local adaptation measures.
- Stronger planning rules to prevent development in high-risk areas. Enniscorthy, County Wexford illustrates the cost of inaction: floodwaters from Storm Chandra in January 2026 reached up to five feet in places, affecting around 20 businesses and 30–40 homes, despite €55 million having been allocated to the Enniscorthy Flood Relief Scheme back in 2014. Construction, which would protect over 300 homes and businesses, remains stalled.
- A major scale-up of nature-based solutions for flood management, cooling, and coastal protection, reflecting their proven role in reducing vulnerability at lower long-term cost than hard infrastructure alone.
- Full resourcing and implementation of the Biodiversity Sectoral Adaptation Plan, given its consistent bottom ranking in successive Adaptation Scorecards despite its centrality to reducing climate vulnerability.
- Adaptation finance addressed on both domestic and international fronts. Domestically, the Climate Action Fund should explicitly include adaptation as a core eligibility theme rather than leaving it a missed opportunity within community-led projects. Internationally, Ireland's overshoot of its fair share of the global carbon budget must be matched by increased, additional climate finance to the Global South to address the adaptation costs it has disproportionately contributed to.

A practical benefit of including adaptation measures in the annually updated Climate Action Plans would be the potential to course-correct and introduce additional measures between the five-year updates to the National Adaptation Framework, rather than allowing gaps identified through monitoring to persist unaddressed for years at a time.

End.

EJNI is a network organisation promoting environmental justice across the island of Ireland. It brings together researchers, legal practitioners, civil society organisations, and affected communities to advance environmental democracy, just transition, and climate governance accountability. For more information, visit: www.ejni.net