



# Community Law & Mediation

and the Centre for Environmental Justice

Community Law and Mediation's Centre for Environmental Justice welcome the opportunity to submit to the consultation "*Review of the security of energy supply of Ireland's electricity and natural gas systems.*"

## Context

The International Energy Agency defines energy security as the "uninterrupted availability of energy sources **at an affordable price.**" The International Monetary Fund has warned that the price of fossil fuels is likely to remain high for some time.<sup>1</sup> Indeed, the myth of cheap gas is over. One euro per megawatt hour of fossil gas on the Dutch TTF – one of Europe's major wholesale gas price markets – cost more than €227 on March 22<sup>nd</sup>. In 2020, the average cost per megawatt hour was €80. Increased fossil gas prices have been the primary cause behind higher wholesale electricity prices, which in turn, have been the primary factor in the cost of living crisis. New fossil fuel infrastructure would lock households into high gas and electricity prices for decades to come.

Furthermore, Ireland is continuing to delay on legally-binding climate action. Ireland currently has one of the highest levels of greenhouse gas emissions per capita in Europe – 61% higher than the EU average - and, contrary to longstanding recommendations of the UN's Intergovernmental Panel on Climate Change (IPCC), Ireland's emissions have been rising rather than falling. The window to deliver the first carbon budget (2021-2025) is closing rapidly. One-third of the five-year budget period has passed, yet Ireland's emissions rose by 5% last year and may increase in 2022. It is still possible to stay within this legally-binding budget, but rapid, deep, and sustained reductions in emissions have never been more urgent. Moreover, the earlier action is taken, the easier it will be. If emissions had fallen last year, Ireland could have remained within the budget with annual reductions of 4.8%. However, as emissions increased by 5% last year, and may increase in 2022, reductions of up to 14% in 2023, 2024 and 2025 will be necessary.

It is essential that Ireland makes a fast, rapid, and just transition to a fossil-free energy system as it is the only way to ensure energy security while tackling the climate and energy poverty crises. We include recommendations on how we believe Ireland should address energy security issues below.

## 1. There's no energy security without climate security

Any planned energy security infrastructure must align with Ireland's climate obligations. This means proposed infrastructure must include:

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<sup>1</sup> Celasun, O., Iakova, D., Parry, I. 2022. 'How Europe Can Protect the Poor from Surging Energy Prices.' International Monetary Fund, available at: <https://blogs.imf.org/2022/08/03/how-europe-can-protect-the-poor-from-surging-energy-prices/>

- An assessment of emissions associated with the project and how it aligns with Ireland's first two carbon budgets to 2030 and associated sectoral emissions ceilings.
- Full information on how it will support full decarbonisation of the energy system by the 2030s in accordance with Ireland's target of net zero emissions by 2050 at the latest.
- An examination of health and environmental impacts
- Full information on how the infrastructure will be used (e.g. only in an emergency) and how it will be phased out (e.g. in order to prevent undue reliance on backup infrastructure).

## **2. Say No to Liquefied Natural Gas:**

Make the current moratorium on LNG and fracked gas imports permanent through legislation. The [independent expert report](#) makes clear that commercially-operated or state-owned LNG import terminal on land, such as Shannon LNG, should not be supported as it would like result in the importation of fracked gas, it would have high emissions and there's no guarantee volumes would be sufficient to cover a security of supply shock.

## **3. Take steps to end current licences for fossil fuel exploration**

[The independent expert report](#) makes clear that additional gas reserves from existing exploration licences, such as from Providence or Corrib should not be supported as "[a]dditional domestic production of natural gas could lock Ireland into a high-gas energy market...Unknown volume of any potential additional natural gas discoveries."

## **4. Introduce a moratorium on new data centres connecting to the electricity grid until electricity system pressures and gas lock-in risks are transparently and comprehensively addressed.**

The assumption that electricity demand, particularly due to data centres, is allowed to continue to expand is deeply problematic. It is unacceptable, from both a moral and policy perspective, for data centres to continue to be approved and connected while households and smaller businesses are being asked to reduce their demand over the coming winter and beyond due to the gas crisis. The [UCC MaREI research centre has highlighted a pause in the connection of new data centres as the most impactful single action the Government can take to reduce electricity demand](#). Gas demand projections are also not in accordance with climate targets.

## **5. Plan for a zero carbon electricity system by 2030**

The [independent expert report](#) clarifies the positive contribution that can be made from energy efficiency, offshore wind, solar, battery storage and further interconnection. These must be prioritised instead of continuing dependence on dirty, expensive and unreliable fossil fuels. The state has the technologies and the resources to protect and decarbonise our electricity system. The Government must choose to use them and not fall back into old ways of thinking.

## **6. Support energy security at household level**

### A) Energy efficiency is energy security:

The Government must focus on energy efficiency solutions as they will permanently enhance our security, reduce emissions and protect households from rising energy costs. As the International Energy Agency has highlighted, the most secure gas molecule is the one you do not need. Households and communities must be supported. The Government should insulate 100,000 homes in 2023, prioritising cheaper measures that save energy and money quickly. The focus must be on reaching those most at risk, particularly those who rely on coal and turf. Don't wait for them to apply

to SEAI for a grant, sit down with anti-poverty and community groups to plan a coordinated outreach campaign.

B) Phase out polluting boilers and the gas distribution network:

Installing fossil fuel boilers into the homes of low-income families risks locking them into fossil fuel heating for many years, leaving them vulnerable to global shocks like the current energy crisis. The SEAI have also noted 'a timeline and plan for fossil-fuel phase-out must urgently be put in place if we are to reach net zero by 2050'.

- Ban the further expansion of the gas distribution network from 2023 through legislation.
- Ban fossil fuel boilers in new buildings in 2023. Ban the sale of new fossil gas boilers for any building by 2028. Phase out fossil fuel boilers in existing buildings, prioritising residential homes by 2033. These measures must be backed by improved access to energy efficiency measures and alternative zero-carbon heating options.

C) Lead the solar transformation:

Government should prioritise the rollout of solar PV on the rooftop of 1 million homes by 2030 and on the rooftop of every school by 2025. UCC MaREI research indicates that more than 1 million homes in Ireland have roof space and orientation suitable for 10 solar panels. This action would produce 25% of all residential electricity demand and would contribute to a culture change around the energy transition where citizens are at the heart of climate action.