28 October 2022

To: The Department of Environment, Climate and Communications

We, the undersigned organisations from Ireland, are making this joint submission as part of the public consultation process for the "Review of the security of energy supply of Ireland's electricity and natural gas systems" as published by the Department of the Environment, Climate, and Communications. Ireland's energy system is going through transformational changes and we must ensure pathways of decarbonisation are prioritised as we transition to a zero emissions energy system. Here are the five points for our submission.

## I. Ireland's climate commitments must be prioritised

We support and maintain the review's assessment that Ireleand needs to rapidly reduce its emissions to fulfil its decarbonisation goals. In order to meet our domestic and international climate commitments, Ireland must not build out new fossil fuel infrastructure or new data centres, which will dramatically increase Ireland's energy use. Ireland must urgently focus on sustainable options such as offshore wind, solar, energy efficiency, district heating, and air-sourced heat pumps.

The Intergovernmental Panel on Climate Change has reported that in order to avoid climate catastrophe, we cannot build new fossil fuel infrastructure and produce more emissions. With this in mind, we ask that Government decisions on the "Review of the security of energy supply of Ireland's electricity and natural gas systems" fully acknowledge our climate commitments to achieve net zero emissions by 2050 and propose innovative solutions to upgrade the electricity grid with community-owned and generated renewable energy. Additionally, it must propose that Ireland stop approving private commercial data centres, which as the report suggests could drive up Irish energy usage by 23%. We also request that the final decisions Government make take into consideration the full extent to which energy efficiency and lowering our energy usage can impact our national energy use.

## II. Ireland should not allow commercial or state-owned LNG

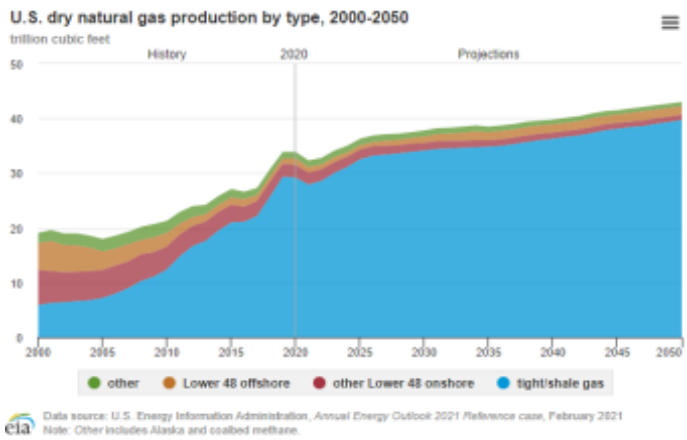
We support the finding in the technical analysis that there is not a need for commercial LNG. Additionally, we do not support state-owned floating LNG or LNG storage. The state-owned floating LNG option would, as we understand it, be rented by the Irish government from private fossil fuel corporations and would still carry a risk of carbon lock-in. It would also likely involve high emissions with no guarantee that volumes would be sufficient to cover a security of supply shock.

Gas extraction releases significant methane emissions, which are over 80 times worse for the climate than carbon dioxide over a 20 year period. The liquefaction, transportation, and regasification process releases even more emissions, making LNG as bad for the climate as coal. In addition to all of the climate impacts, liquefying natural gas, then vaporising it again, involves a major loss of energy – as conversion of one form of energy to another always involves some loss as well as fugitive emissions and leaks – rendering it inefficient in relation to Ireland's decarbonisation goals.

## III. The policy to stop the import of fracked gas must become law.

The review recognises the 2021 Government policy which places a moratorium on the importation of fracked gas and development of LNG . The report undertaken by CEPA as part of the review process makes clear that a commercially-operated or state-owned LNG import terminal on land, such as Shannon LNG, should not be supported as it would likely result in the importation of fracked gas. It is critical that the current moratorium on LNG and fracked gas imports be made permanent through legislation as a result of this review.

Furthermore, there is only one LNG terminal which has applied for planning permission in Ireland: New Fortress Energy on the Shannon River Estuary. While New Fortress Energy has claimed that they would use gas from conventional drilling, their business model is based on extracting and bringing fracked gas to market with highly dangerous transport including trucks on public roads and old rail cars. They use these methods of transport to avoid seeking regulatory permits for pipelines from more stringent U.S. federal agencies. New Fortress Energy has also stated that it will use fracked gas for LNG in its own submission to the U.S. Securities & Exchange Commission. In the U.S., New Fortress Energy is seeking permits to export fracked gas from the Marcellus Shale in Pennsylvania to Ireland. Furthermore, most gas from the United States is from fracking tight/shale gas formations, as this figure from the U.S. Energy Administration Information shows. Importing fracked gas is antithetical to Ireland's energy goals and on a human rights basis since Ireland banned fracking based on both the public health impacts and environmental harms.




## IV. <u>Data centres are a risk to Irish energy security.</u>

The review states that data centres "are forecast to continue to grow by up to ~9 TWh in 2030 (~23% of total demand)". This is deeply problematic. The review wrongly assumes that electricity demand should be allowed to continue to expand without question. The review should acknowledge that data centre energy usage is one of Ireland's biggest energy security risks. Also it is unacceptable, from both a moral and policy perspective, for the Irish Government to continue to approve private corporations to build and operate data centres while households and smaller businesses are being asked to reduce their demand over the coming winter and beyond due to the energy 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. Just as the review rightly asserts that there is not a need for commercial LNG, it should also assert the facts that there is no need for more commercial data centres and the energy security risks they pose to Ireland.

The Irish Government must put in place a moratorium on new data centres. Existing data centres must also be legislated to stop running fossil fuel generators on-site and instead transition to sources of renewable and clean energy technologies.

<u>Furthermore, the expansion of data centres in Ireland contributes massively to energy security risks:</u> In 2020, the Sustainable Energy Authority of Ireland (SEAI) reported that the most significant driver of Ireland's anticipated energy demand increase is the expected growth of data centres, which can have demand levels comparable to those of large towns. Thus, the construction of new data centres is in direct opposition to Ireland's climate emissions reduction goals set forth by its Climate Action Plan. This is supported by a recent study published by the International Institute for Sustainable Development (IISD) that consolidates overwhelming consensus across all published studies regarding new developments supported by oil and gas, and renders them "incompatible" with the Paris Agreement's target of limiting global warming to 1.5C.

We are extremely concerned that the review report assumes that the data centre industry will continue rapidly expanding, resulting in significantly increased gas and electricity demand, again the final report must assert that there is no need for commercial data centres and that they pose significant energy risks to Ireland.

## V. <u>The review must support household energy efficiency and community owned renewable energy and storage.</u>

The energy security review report fails to properly address energy security needs and opportunities at household and community level. Ireland needs to support increased energy efficiency, solar PV and community owned renewable energy and storage, as energy security measures. EU initiatives on "renewable energy communities" run by cooperatives need to be supported in Ireland. Major barriers in place for such initiatives in terms of grid connection; thus, ESB networks need to be mandated to actively support them. Investment in clean-energy infrastructure must be prioritised ahead of fossil fuel development if we are to meet our climate commitments.

In closing, there is no energy security without climate security. Climate obligations and risks of carbon lock-in must be factored into this review. The final Government decisions on the review must propose innovative solutions to upgrade the electricity grid with community-owned and generated renewable energy. Further, it must consider all relevant evidence that suggests the development of private commercial data centres would drive up Irish energy usage, rendering them an overall energy security threat. Ireland has the opportunity to lead Europe and the world in renewable energy and on climate action.

Sincerely,

350.org
An Taisce The National Trust for Ireland
Clare Environmental Network
Clare Says No To CETA
Climate Action Wexford (CAW)
ClimateCARE.ie
Concerned Health Professionals
Connaught One Future
Dublin Friends of the Earth
Extinction Rebellion Galway
Extinction Rebellion Ireland
Feasta: The Foundation for the Economics of Sustainability

Fracking Free Clare
FreshWater Accountability Project
Friends of the Earth Ireland
Futureproof Clare
Galway One World Centre
Gluaiseacht
Good Energies Alliance Ireland
Kinvara Ballinderreen Tree Gang
Kinvara Climate Action
Kinvara Pesticide Action
Mothers Day Mother Earth
Oxfam
The National Council for (the status) of People with Disabilities (NCPD)
Project Allende
Safety Before LNG
ShamrockSpring
Síolta Chroí
Third Space Galway
Transition Monaghan
Transition Town Kinsale
Union of Students in Ireland
Wall of Women
Wexford Environmental Network