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Joint Oireachtas Committee on Climate, Environment and Energy

Engagement with Climate Experts on Carbon Budgets

Professor Hannah Daly

Opening statement

Chair, Deputies and Senators, thank you for the invitation to give evidence today on the proposed second cycle of carbon budgets. I am speaking in my capacity as Professor of Sustainable Energy at University College Cork, where I lead research on energy transitions and climate policy.

I was also a member of the Climate Change Advisory Council's Carbon Budgets Working Group, and led the energy system modelling scenarios that underpin the Council's proposals.

The matters before you on the proposed carbon budgets are of great importance. Carbon budgets are the mechanism through which Ireland translates its international climate obligations into binding limits at home. They are our contribution to the Paris Agreement goal of holding global temperature rise to 1.5 °C. We are now dangerously close to breaching that threshold, profoundly threatening our security and wellbeing. Climate safety depends on collective action. To protect ourselves, we need others to cut emissions deeply, and so we must show that we are willing to do the same

Carbon budgets also matter for the sectors that need to transform. They should give clarity and direction to farmers, to energy companies, to industry, to households, about the direction, scale and pace of change required. If they are to succeed, they must be transparent, robust, and subject to close public scrutiny. People need to see not only what the targets are, but why they are set at this level, and how they will be delivered in practice. That is the only way they can be understood, trusted, and implemented.

1. Findings from the energy system scenarios

To support the Council's task in preparing a second carbon budget programme, my team in UCC modelled multiple pathways for Ireland's energy system to 2050, under different carbon budgets. These scenarios present pathways for **urgently ending our dependence on fossil fuels**,

Oil, gas, peat and coal still supply more than 80% of our energy and leave us profoundly vulnerable. This dependence costs households, businesses and the State billions every year. During the recent energy crisis, fossil fuel imports drove inflation, energy poverty, and required €1 billion in emergency energy credits just in 2024.

By contrast, the alternatives are available, and are more affordable and viable than ever. The sustainable energy transition entails the following five actions:

1. **Wind and solar** – renewable electricity is the backbone of the transition – supported by **electricity storage and a strengthened grid** –
2. **Electrifying transport** – ending sales of fossil cars, vans and trucks and accelerating EV adoption. We have no carbon budget left for new fossil fuel cars.
3. **Reducing unnecessary car use** – through compact development, public transport and active travel.
4. **Retrofitting and clean heat** – retrofitting, rolling out heat pumps and district heating.
5. **Decarbonising industry** – shifting away from oil and gas to efficiency, electrification, and in some cases, biogas.

These solutions – renewables, electrification, efficiency – are not speculative technologies for the future. They are proven, scalable, and already being deployed around the world. The main barriers are political will, institutional capacity, and time – not technology, and not costs.

Our modelling confirms that moving faster on these fronts is less costly than sticking with current policies¹. **Delayed action cost more**: it means locking in fossil infrastructure, higher compliance costs, and greater reliance on risky carbon removals later. By contrast, cutting fossil fuels now can reduce costs, strengthens energy security, and can bring major benefits for health, equity and prosperity.

Forces that delay this transition should be rejected. Data centres are growing at such a dramatic pace that they could represent a new era of demand for gas. Our economic model must stop relying on fossil fuel. I am also concerned about the reliance on HVO to decarbonise oil, despite major red flags.

Even though the costs are manageable and the solutions are scalable, Government has to play a leading role by making the higher upfront cost of clean energy affordable, by building infrastructure, like public transport and the electricity grid, and ensuring that all parts of the State are working together to achieve this mission.

2. The question of climate neutrality and methane

I also wish to address the Council's choice to interpret Ireland's statutory obligations to align carbon budgets with "climate neutrality" by 2050 at the latest, and with our obligations under the Paris Agreement, as "temperature neutrality" – meaning no additional warming by 2050. I supplement this statement with a detailed briefing report on the matter, led by my colleague Dr. Róisín Moriarty.

"Temperature neutrality" diverges from international norms, including, crucially, the EU's definition of climate neutrality as *net-zero greenhouse gases by 2050*.

There are several problems with the approach.

Firstly, scientific inadequacy. Under temperature neutrality, methane emissions could continue to remain at very high levels, continuing to cause substantial warming, yet be treated as "climate neutral". This ignores robust scientific evidence that cutting methane sharply is one of the strongest and most immediate levers we have for slowing temperature rise in the next decade or two. The Paris Agreement requires us to pursue the *highest possible ambition*, grounded in equity and fairness. That means methane must decline sharply – at least 30% by 2030 in line with the Global Methane Pledge, and deeper thereafter.

Secondly, temperature neutrality can cause perverse outcomes, such as an apparent "cooling" from reducing methane (treated as equivalent to carbon dioxide removal), even though emissions remain high. Scholars have shown that such approaches embed "grandfathering" of emissions entitlementsⁱⁱ. This rewards high emitters, is deeply unfair, and runs against the principle of climate justice within the Paris Agreement.

Recent analysis also warns that the method underpinning temperature neutrality is unstable and ill-suited for national carbon budgetingⁱⁱⁱ.

Thirdly, setting a precedent. Ireland's per-capita methane emissions are already among the highest in the world, due to our large ruminant livestock sector. If we adopt a weaker definition of climate neutrality, we will not only lock in an inequitable share of warming for ourselves but also set a precedent for others to follow, a dangerous signal at this critical juncture. Earlier this year I joined more than 20 climate scientists, including some of the world's most eminent, in an open letter to New Zealand's Prime Minister warning against a similar plan to adopt temperature neutrality for methane^{iv}.

Moreover, even for CO₂, temperature neutrality is insufficient. The world is now overshooting 1.5 °C, but the Paris Agreement obliges us not to give up. We must peak global temperatures as soon as possible and bring them back down. That requires reaching net-zero CO₂ and then going net-negative, alongside ambitious methane cuts. Stabilising contributions to warming, for either gas, is insufficient.

In effect, adopting temperature neutrality means either giving up on the Paris Agreement's central goal of limiting warming to 1.5 °C, or else requiring other countries to do more to compensate.

Weaker methane emission reduction ambition, and the use of temperature neutrality at the national level, has been justified on the basis of protecting global food security, because it can avoid 'emission leakage' from countries that export livestock products with below-average GHG intensities. However, a recent study led by the University of Galway⁹ demonstrates such justifications have little merit given that global trade in animal-sourced foods largely benefits wealthy markets, and often relies on imported feed, contributing to indirect land use change. Moreover, temperature neutrality would constrain the developmental space for low-income, food-insecure countries, compounding the injustice.

By contrast, we should look to Denmark. The agricultural sector there accounts for nearly one third of emissions, and its government is pressing to *increase* ambition. It has committed not only to bring forward the date of net-zero, but to go further by reaching net-negative emissions by 2050, a target which includes all gases. This is the kind of leadership Ireland should be emulating, rather than lowering ambition through a redefinition of neutrality.

For these reasons, adopting temperature neutrality as Ireland's interpretation of climate neutrality would be a mistake

3. Recommendations

In conclusion, I recommend that the Committee reject temperature neutrality as a basis for carbon budgets, and adopt budgets that are aligned not only with our obligations under the EU, but under the Paris Agreement goal of limiting warming to 1.5 °C.

I also urge the Committee to recommend an immediate acceleration in action across energy, efficiency, land and agriculture. We cannot wait until the 2030s. Stronger measures now will reduce costs, avoid stranded assets, give time to plan a positive and just transition for all sectors, and give us a fighting chance of delivering carbon budgets 3 and 4. The Climate Action Plan under preparation is a crucial opportunity to do this.

The decisions this government takes on carbon budgets will reverberate for decades. They will shape whether Ireland is seen as a leader or a laggard, whether we saddle future generations with impossible targets and unmanageable risks, or whether we grasp the benefits of a rapid and fair energy and food system transformation.

We have the knowledge, the tools, and the responsibility. What is needed now is the political will to act at the highest possible ambition, as our law and our conscience demand.

Thank you.

Attachments:

Moriarty & Daly (2025) - *Basing Ireland's carbon budgets on temperature neutrality would undermine obligations under the Paris Agreement*. Policy Brief, Energy Policy and Modelling Group & Sustainability Institute, University College Cork.

<https://doi.org/10.5281/zenodo.17120229>

Daly et. al. (2024) – *Pathways for Ireland's energy system to 2050: Modelling analysis to support the Climate Change Advisory Council on the Second Carbon Budget Programme*. Report, Energy Policy and Modelling Group & Sustainability Institute, University College Cork.

<https://www.climatecouncil.ie/media/CBWG%20Report%20TIMES-Ireland%20Model.pdf>

EPMG & SEAI (2024) – *The Big 5: Five Actions for 90% Energy Emissions Savings to 2030*.

https://www.seai.ie/sites/default/files/2024-10/The%20Big%205%20info%20sheet_0.pdf

ⁱ Aryanpur et. al., 2024 <https://www.nature.com/articles/s44168-024-00181-7>

ⁱⁱ Rogelj & Schleussner, 2019 <https://iopscience.iop.org/article/10.1088/1748-9326/ab4928>

ⁱⁱⁱ Meinshausen & Nicholls, 2022 <https://iopscience.iop.org/article/10.1088/1748-9326/ac5930>

^{iv} Open letter to www.biogenicmethane.org

^v Duffy et. al., 2025 <https://iopscience.iop.org/article/10.1088/1748-9326/adf12d>

PATHWAYS FOR IRELAND'S ENERGY SYSTEM TO 2050

Modelling analysis to support the Climate Change Advisory Council on the Second Carbon Budget Programme

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EXECUTIVE SUMMARY

Ireland's energy system must achieve net-zero emissions well before 2050 to meet carbon budgets consistent with the Paris Agreement commitment, requiring accelerated cuts in greenhouse gas emissions in power, buildings, industry and transport. Delays in implementing mitigation measures will increase costs and make it harder to meet carbon budgets, highlighting the urgency of immediate action to avoid locking in fossil fuel use and relying on uncertain carbon removals.

Global demand for fossil fuels has not yet peaked, putting the world on track to significantly breaching the temperature goals set out in the Paris Agreement. Temperatures will continue to rise until greenhouse gas emissions reach net-zero. Ireland, which contributes disproportionately to global heating, has established a legal framework and detailed implementation plan to reduce greenhouse gas emissions significantly by 2030. Although the energy transition is gathering pace, current mitigation measures are not on track to meet legally-binding carbon budgets. This projected overshoot poses a major risk and represents a lost opportunity. The urgency of limiting cumulative emissions—and hence global warming—calls for the development of long-term strategies that extend beyond 2030.

This report outlines multiple scenarios for Ireland's energy system from now until 2050, under varying levels of climate ambition. It focuses primarily on the decade after 2030 to inform the Climate Change Advisory Council's (CCAC) assessment of third and fourth carbon budgets. Developed iteratively by the Energy Policy and Modelling Group in UCC in 2023-24 as part of the Carbon Budgets Working Group (appointed by the CCAC), the scenarios present the necessary investments, mitigation measures, and choices across energy supply, electricity, transport, heating, and industry under carbon budgets of different stringency, with varying assumptions about near-term decarbonisation and future energy demands.

Key findings are as follows:

- **Net-zero is critical, but cumulative CO₂ emissions determine total global warming.** Ireland's climate ambition should be framed around cumulative carbon budgets, as the pathway and timing to net-zero are crucial to limit dangerous temperature rise. Emissions from Ireland's energy system need to reach net-zero, or close to zero, well before 2050 and turn negative thereafter. For example, the most ambitious scenarios show a need for Ireland to reach net-zero by around 2035 and also deliver significant reductions in non-CO₂ emissions. If emissions overshoot the committed carbon budgets to 2030 (as projected), the remaining budget post-2030 will be negligible, even under moderate ambition.
- **All scenarios require deeper emissions cuts in the period to 2030 and 2040 than currently planned.** An immediate acceleration of mitigation measures is necessary. Delayed action will increase costs, lead to negative trade-offs (e.g., land use), and make long-term targets less feasible.
- **Costs and Benefits:**
 - The most ambitious carbon budget modelled (250Mt) can be achieved with a modest increase in total annualised expenditure relative to a "No Mitigation" scenario—only 0.3% of GDP in 2020. This is due to long-term savings from reduced fossil fuel imports.
 - Current policy scenarios ("With Additional" and "With Existing Measures") are more costly than several of the modelled carbon budget scenarios because they do not phase out fossil fuels in favour of cheaper, low-emitting alternatives.
- **A near-complete phase-out of fossil fuels is required by 2040 for power, buildings, and transport.** The phase-out of peat, coal, and oil is particularly urgent. There is nearly no remaining carbon budget for new investments in fossil fuels, including internal combustion engine vehicles, and natural gas demand declines significantly, requiring a plan to decommission its infrastructure.

- **Electrification of transport, heat, and industry is a key mitigation lever**, alongside decarbonising electricity supply. While this transition requires substantial upfront investment, it is cost-effective in the long run due to falling costs of renewables and batteries and the broader societal, health, and economic benefits.
- **Delivering the scenarios relies on strong political, societal, and institutional capacity**. Most of the required technologies are mature and affordable: time, not technology, is the primary constraint. Significant operational and market innovations, such as in energy storage and grid management, will be needed.
- **Final energy demand reduction is essential for meeting ambitious carbon budgets**. Reducing energy demand through compact urban development, modal shift in transport, and shifting support to less carbon-intensive economic activities are an important complement to technology transitions. These changes will require substantial state investment and policy support.
- **Buildings and transport need to be almost fully decarbonized by the mid-2030s**. This requires a rapid phase-out of oil- and gas-based heating systems and internal combustion engine vehicles by 2025, which is not aligned with current market trends.
- **Carbon dioxide removals (CDR) will be necessary for most scenarios**, especially under ambitious mitigation targets or if early carbon budgets are overshoot. CDR technologies such as Biomass with Carbon Capture and Storage (BECCS) bring risks, including high costs, technology uncertainties, and conflicts with land use and biodiversity. Pursuing strategies that minimise reliance on CDR through strong early mitigation is essential.
- **Ireland may need to adopt negative carbon budgets** due to potential overshoot of its current carbon budgets and the likelihood that the 1.5°C threshold will be exceeded soon. Any overshoot must be compensated in future budget periods, leaving limited flexibility and necessitating net-negative targets.
- **Comparison with EU Targets**: The European Commission has recommended that the EU cut greenhouse gases by 90% by 2040 relative to 1990 levels. While Ireland's exact target is yet to be defined, the scenarios in this report provide a benchmark against a range of potential 2040 targets.
- **Availability of results**: The scenarios were developed using the peer-reviewed, open-source TIMES-Ireland Model. Detailed results for all scenarios can be explored and downloaded on a web portal: https://epmg.netlify.app/TIM-Carbon-Budget-August_2024

ACKNOWLEDGEMENTS

We acknowledge and are grateful for the contributions of past and current members of UCC's [Energy Policy and Modelling Group](#), particularly those who contributed to the development of TIM and its predecessor, the TIMES-Ireland Model. We are also thankful to the CCAC and members of the [CBWG](#), particularly SEAI's energy modelling team and Prof. John FitzGerald, for constructive feedback on previous iterations of this research, and others who provided comments on the draft report. This research was part-funded by the Department of Environment, Climate and Communications through the [CAPACITY](#) project - Climate and Energy Modelling Services to the Climate Action Modelling Group (CAMG) (grant no. RFT2022/S 164-466018).

1 INTRODUCTION

1.1 TERMS OF REFERENCE

UCC's Energy Policy and Modelling Group (EPMG) is supporting the Climate Change Advisory Council (CCAC) through the Carbon Budgets Working Group (CBWG) in the Council's statutory role of proposing finalised carbon budgets 3 (2031-35) and 4 (2034-40) by the end of 2024. The CBWG is tasked with developing an evidence base for the Council's carbon budget proposals by providing modelling and analytical support.

As part of this process, the EPMG modelled future potential pathways for Ireland's energy system consistent with different levels of decarbonisation ambition, covering energy supply, electricity, transport, buildings and industry. The purpose of these scenarios is to indicate the pace and depth of change across the energy system necessary to meet different levels of mitigation ambition, including the timing of introducing new technologies, indicating the reliance on speculative technologies, and the role of energy demand reduction. While TIM does not explicitly model several important aspects of climate action, including the just transition, biodiversity impacts, climate justice, and consequences for investment, the macroeconomy, energy bills and energy security, these modelled scenarios provide a quantitative basis for developing analyses on these aspects of climate action.

This report is the final outcome of this process, describing the results from the third round of three modelling iterations during 2023 and 2024. The report also contains an accompanying descriptive narrative for each of the modelled scenarios, outlines the rates of deployment and costs by technology, describes the role of carbon dioxide removal (CDR), and includes a commentary on potential pitfalls and practical implications. The report also discusses the implications of overshooting existing carbon budgets in the period to 2030 on the basis of current policies.

This set of scenarios have been developed following feedback and review from the Council and other members of the CBWG. While our approach has been endorsed by the Council, it should not be seen in any way as an indication of the Council's position on the second carbon budget programme.

This report contains three appendices. Appendix 1 contains an in-review academic paper, which examines the implications of early carbon budget overshoot. This study is based on the first iteration of modelled scenarios for the CBWG but insights remain applicable to this report. Appendix 2 describes our approach to developing carbon budgets (2021-2050) for Ireland. And Appendix 3 contains more detailed model assumptions and data sources, as well as limitations and caveats.

2 METHODOLOGY AND KEY ASSUMPTIONS

Model description: The TIMES-Ireland Model (TIM) produces detailed technology-explicit pathways on the future evolution of Ireland's energy system – which encompasses the import and extraction, processing, transformation and consumption of all energy carriers (electricity, heat, and liquid, gaseous and solid fuels, whether fossil or non-fossil) in each sector (transportation, buildings and industry), as well as the investment and operation of all technologies that generate, transform or consume energy, and resultant greenhouse gas emissions arising from the combustion of fossil fuels and industrial processes. Rather than predicting or forecasting the future, this model works backwards from a given carbon budget, set of possible future energy demands and assumptions around available technologies, to develop “least cost” pathways. User-defined constraints are typically imposed to reflect the speed at which new technologies can be practically deployed. In this way, energy systems models like TIM can inform the necessary milestones for the energy transition, which can be used to develop policy, prepare infrastructure and examine trade-offs between certain objectives. Energy systems models are often used in conjunction with other detailed sectoral models.

Carbon budgets: The scenarios developed for this study are centred around five different Carbon Budgets (CBs) ranging from 250 million tonnes of CO₂e (Mt) to 450Mt (Figure 1). These CBs are imposed as a constraint on total GHG emissions from the sectors covered in TIM - fossil fuel combustion across Ireland's energy system (covering power, buildings,

transport) plus industrial process emissions, and excluding international aviation and shipping. Additionally, in the core scenarios, an additional CB constraint of 275Mt is imposed on the period 2021-2030 to reflect the mandated SECs in the first two carbon budgets¹. Emissions embodied in the SECs already overshoot the most ambitious climate mitigation scenario, and if fully utilised would leave 25Mt of carbon removals in the period after 2030. At the other end of the spectrum, fully utilising the SEC carbon budgets would allow 175Mt of GHG emissions post-2030 in the least ambitious 450Mt scenario.

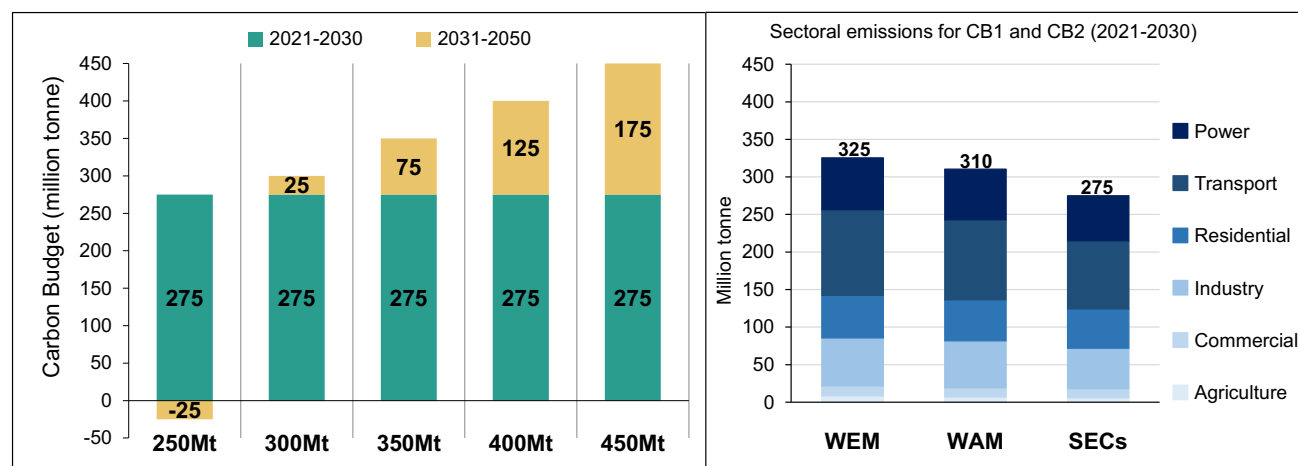


FIGURE 1: MODELLED CARBON BUDGET SCENARIOS FOR THE ENERGY SYSTEM, COMPARED TO CARBON BUDGETS COMMITTED DURING CARBON BUDGETS 1 & 2, AND THE REMAINING CARBON BUDGET FROM 2031-50 (LEFT PANEL), AND ENERGY SYSTEM SECTORAL EMISSIONS FOR CARBON BUDGETS 1 & 2 (RIGHT PANEL)

The implications of overshooting early carbon budgets are explored in detail in a paper which is under review for publication in an academic journal, and contained in Appendix 1.

Current policy scenarios: Despite the development and implementation of mitigation policies as part of the annual Climate Action Plans², greenhouse gas emissions are on track to exceed the legislated sectoral budgets in the period to 2030, according to projections by the Environmental Protection Agency (EPA)³. The EPA’s “With Existing Measures” (WEM) scenario is a projection of future emissions based on the measures currently implemented and actions committed to by Government, while the “With Additional Measures” (WAM) scenario includes all policies and measures included in the WEM scenario, plus those included in Government plans but not yet implemented.

According to Ireland’s climate law, any exceedance of GHG emissions in one CB period must be made up for with additional mitigation in the subsequent CB period (in other words, an overshoot in one CB is subtracted from the subsequent one). Therefore failure to deliver on CBs will lead to even smaller CBs in the 2030-2040 period, which is a major threat to their feasibility. To assess the threat to future carbon budgets of a failure to deliver on carbon budgets this decade, this report includes scenarios for each CB case which imposes CBs aligned with WEM and WAM in the period to 2030. These scenarios are named “300Mt-WAM”, “450Mt-WEM” etc.

Moreover, this analysis also includes three additional scenarios which do not impose carbon budgets:

- *BaU-WEM2050* – aligns each sector’s GHG emissions with the EPA WEM scenario from 2024-2050
- *BaU-WAM2050* - aligns each sector’s GHG emissions with the EPA WAM scenario from 2024-2050
- *NoMitigation* - no carbon budget or GHG target is imposed in this scenario.

¹ <https://www.gov.ie/en/publication/76864-sectoral-emissions-ceilings/>

² <https://www.gov.ie/en/publication/79659-climate-action-plan-2024/>

³ <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-greenhouse-gas-emissions-projections-2023-2050.php>

Final energy demand: Two distinct demand projection scenarios, Business as Usual (BAU) and Low Energy Demand (LED), are considered (see in detail in Appendix 3). Additional details of the distinction between the two scenarios can be found in Gaur et. al. (2022)¹. We model all five CBs with the BAU and LED demand projections. Combining the CB and demand projection pathways, we analyse mitigation pathways across 30 scenarios (Figure 2).

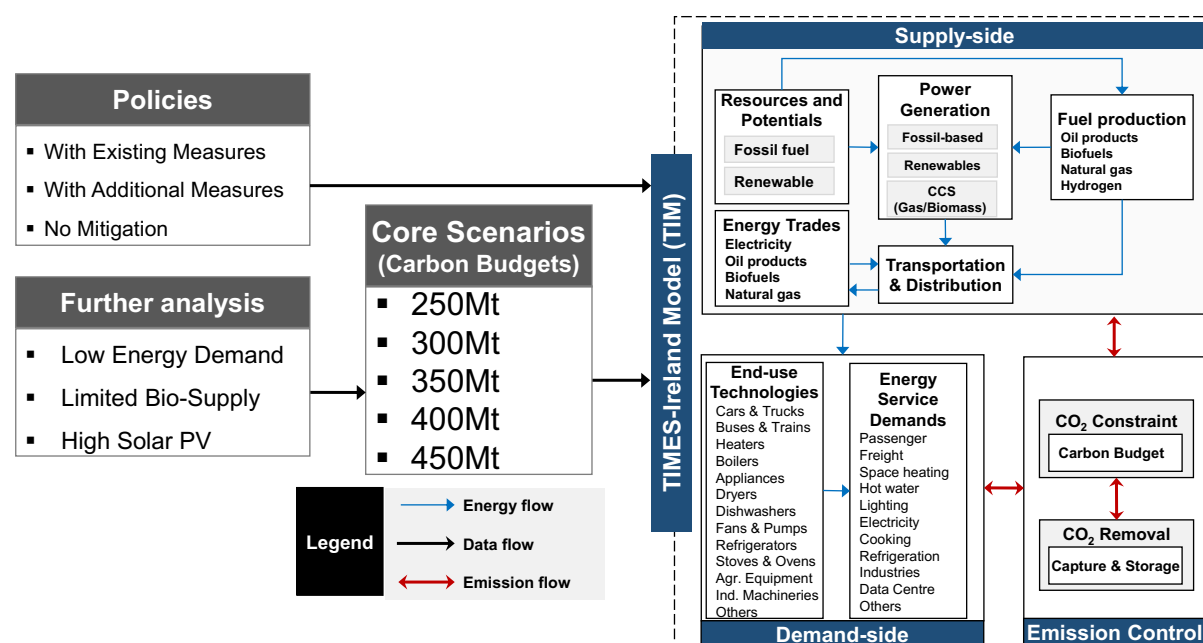


FIGURE 2: SCENARIO DEFINITIONS AND MODEL SCHEMATIC

Key assumptions and detailed methodology: Details on TIM's core methodology can be found in the model documentation paper². The model itself is open-source and peer reviewed, and its files and input data and results archives used for this study can be downloaded from EPMG's GitHub repository³. The software tools necessary to solve and interact with the model are available, but require advanced training⁴.

Generally speaking, these scenarios do not model the impact of technology targets or measures, such as the number of electric vehicles or production of biomethane in 2030. Rather, these are key outputs of the model, which chooses the "optimal" level of technology deployment in a given year to meet carbon budgets and energy demands in each scenario. However, in some cases, technology deployment rates are influenced by user constraints, which are often used to limit the speed at which new energy sources and technologies can be deployed. Otherwise, the model could choose pathways that could be considered "infeasible", or so unlikely so as to be incredible – such as installing 5 GW of offshore wind capacity in 2025. Choosing user constraints to reflect "feasible" rates of technology deployment requires subjective judgment. Key assumptions are detailed in Appendix 3.

Detailed results: Detailed results for all scenarios can be explored and downloaded on a web portal:

https://epmg.netlify.app/TIM-Carbon-Budget-August_2024

¹ Gaur, A., Balyk, O., Glynn, J., Curtis, J. & Daly, H. Low energy demand scenario for feasible deep decarbonisation: Whole energy systems modelling for Ireland. *Renewable and Sustainable Energy Transition* 2, 100024 (2022) <https://doi.org/10.1016/j.rset.2022.100024>

² Balyk, O. et. al. (2022): TIM: Modelling pathways to meet Ireland's long-term energy system challenges with the TIMES-Ireland Model (v1.0), *Geoscientific Model Development*, <https://doi.org/10.5194/gmd-2021-359>

³ Model files: <https://github.com/MaREI-EPMG/times-ireland-model>
Archive of model results: <https://zenodo.org/records/13497444>

⁴ IEA-ETSAP, Antti-L, & G. Giannakidis. (2021). ETSAP-TIMES/TIMES_model: TIMES Version 4.5.3 (v4.5.3). Zenodo. <https://doi.org/10.5281/zenodo.4660551>

3 CARBON BUDGET PATHWAYS

3.1 CARBON BUDGETS WITH BAU ENERGY DEMAND

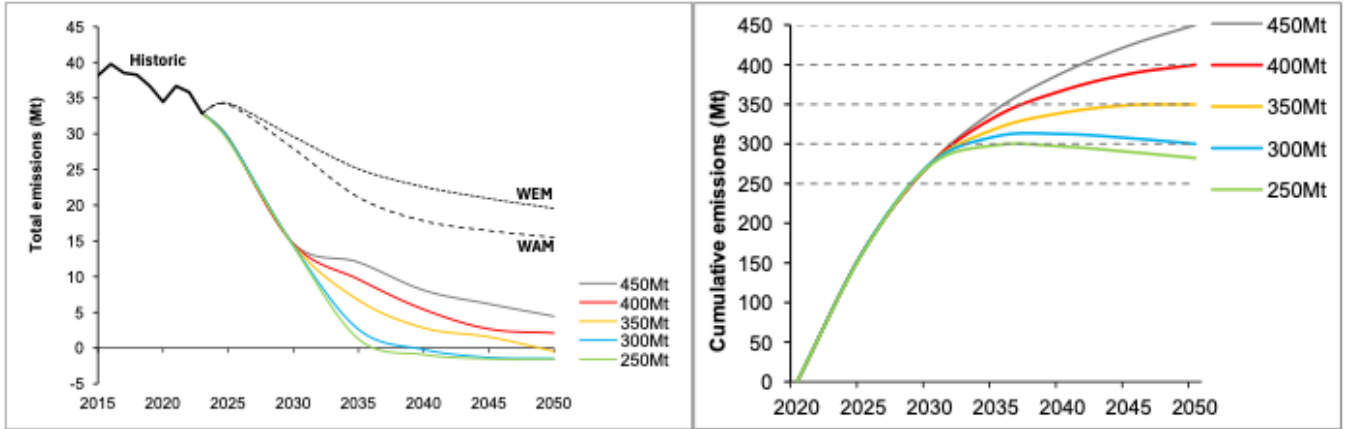


Figure 3 describes the annual and cumulative GHG pathways. Higher carbon budgets allow for greater emissions in later periods: the *400Mt* and *450Mt* cases do not achieve net-zero by 2050, while the *250Mt* and *300Mt* cases each reach that milestone before 2040 and thereafter go negative.

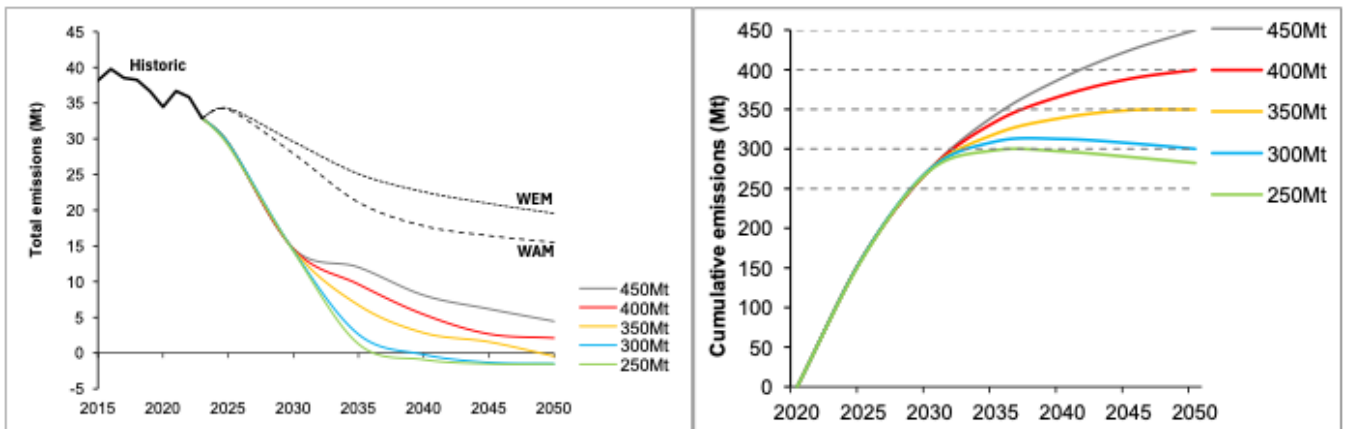


FIGURE 3: EMISSIONS PATHWAYS IN EACH CARBON BUDGET SCENARIO WITH BAU DEMANDS, COMPARED TO THE EPA “WITH EXISTING MEASURES” (WEM) AND “WITH ADDITIONAL MEASURES” (WAM) SCENARIOS (LEFT) WITH CUMULATIVE PATHWAYS (RIGHT).

Figure 4 shows the 5-year distribution of carbon budgets in each scenario. It shows that each carbon budget is fully delivered in each, apart from *250Mt*, where there is an “overshoot” of 32Mt. “Overshoot”, or “unmitigated emissions” in this context refers to greenhouse gas emissions from the energy system which the model could not find a viable solution to mitigate (at a cost of <€2000/t), within the given scenario framework - the modelled set of carbon budgets, demands and technology assumptions.

As shown later in this report, in section 3.3, this overshoot is eliminated with LED assumptions. It is also reduced with more ambitious assumptions on solar PV deployment.

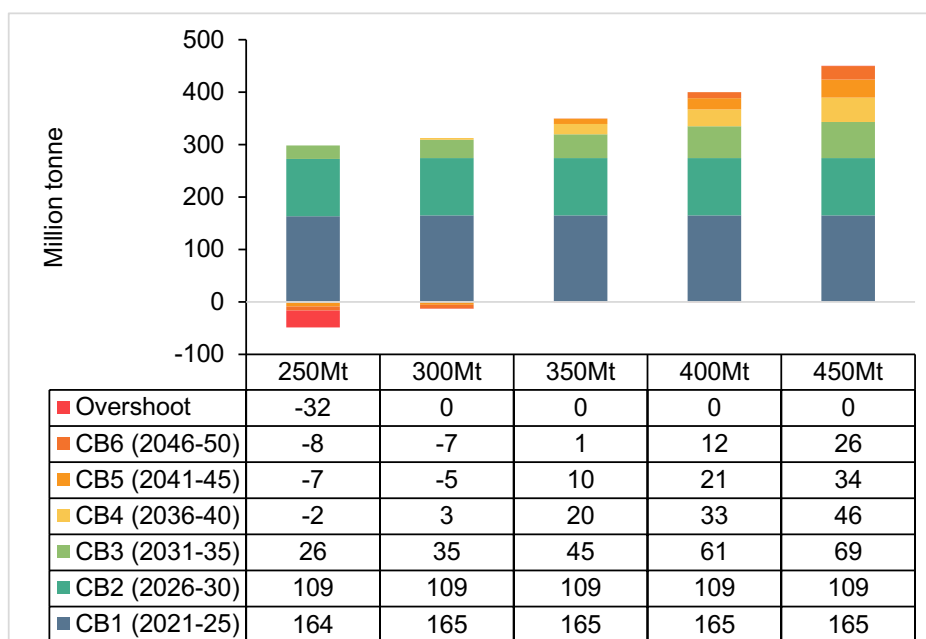


FIGURE 4: 5-YEAR BREAKDOWN OF CARBON BUDGET FOR EACH BAU SCENARIO, INCLUDING “OVERSHOOT” (UNMITIGATED EMISSIONS)

Figure 5 shows the average marginal abatement cost (MAC)¹ in each decade across each core scenario. Smaller carbon budgets lead to larger MACs. Specifically, the abatement cost more than doubles in the 250Mt case compared to the 300Mt scenario – this is because in the former case, the model is unable to fully deliver the carbon budget without “overshoot” with GHG mitigation measures, and is required instead to invest in a backstop carbon removal technology, which cost €2000/tCO₂.

The average MAC from 2021-2030 in each scenario between 300Mt and 450Mt – around €750/tCO₂ – is higher than in subsequent decades because a core assumption is that legally-binding SECs are imposed in this decade.

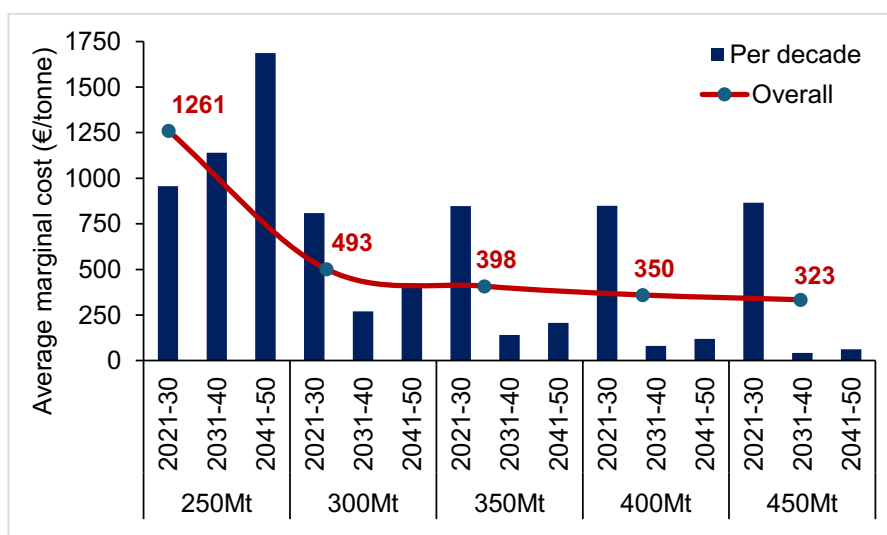


FIGURE 5: MARGINAL ABATEMENT COST IN CORE SCENARIOS

Figure 6 illustrates the financial implications of each carbon budget scenario compared to a “No Mitigation” scenario, where no climate policy is imposed. The total cumulative energy system cost in the most stringent carbon budget case, 250Mt, is €42 billion over the period 2021-2050, which translates to a cost of €21 per person per month over the 30

¹ The marginal abatement cost is the (discounted) cost to the model of removing the most expensive tonne of GHG emissions from the energy system – it is a measure of the most expensive mitigation measure in a given scenario, rather than the average cost.

years. This additional cost is equivalent to 0.33% of the average modified Gross National Income (GNI*) over the period. The additional costs in other scenarios are significantly lower.

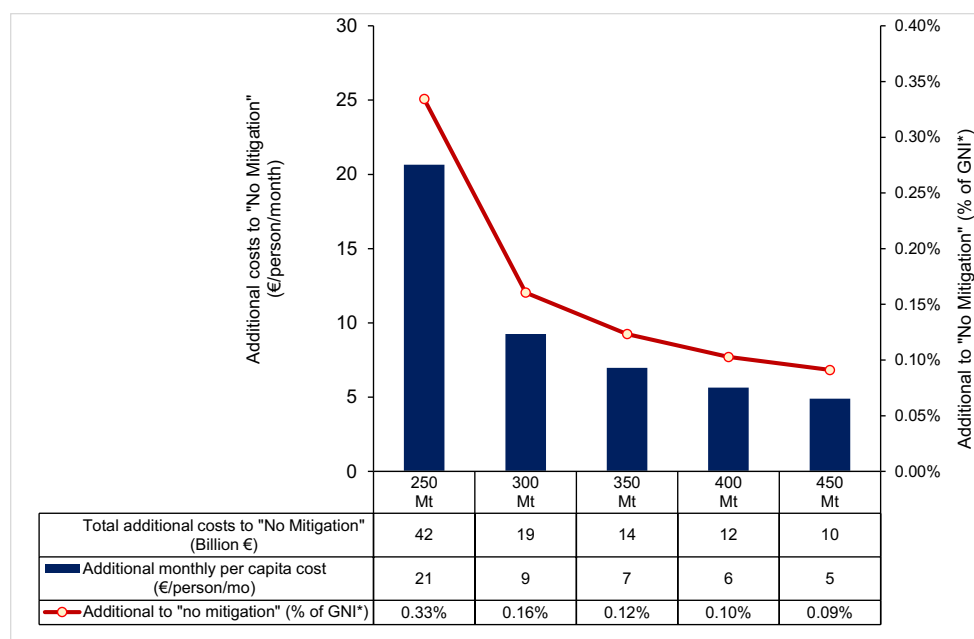


FIGURE 6: ADDITIONAL COSTS IN CORE SCENARIOS COMPARED TO THE NO MITIGATION SCENARIO

While these scenarios bring a modest additional cost relative to a scenario where no carbon budget is imposed, they actually bring cost savings relative to the WEM and WAM scenarios

Figure 7 shows the additional costs of WEM and WAM compared to the core 300Mt scenario. An important finding is that both WEM and WAM lead to higher total and per capita costs than the 300Mt scenario, with WEM being significantly more expensive—an extra €9 billion in total cumulative costs over 2021-2050 compared to WAM, and €23 billion relative to the 300Mt scenario. While WAM represents more ambitious mitigation than WEM, it is still less cost-effective than the core 300Mt scenario, because of the prolonged reliance on fossil fuels in later decades. The analysis highlights the economic advantage of taking stronger mitigation actions now rather than delaying decarbonisation, as delayed action imposes a greater financial burden on society in the long run from fossil fuel dependence.

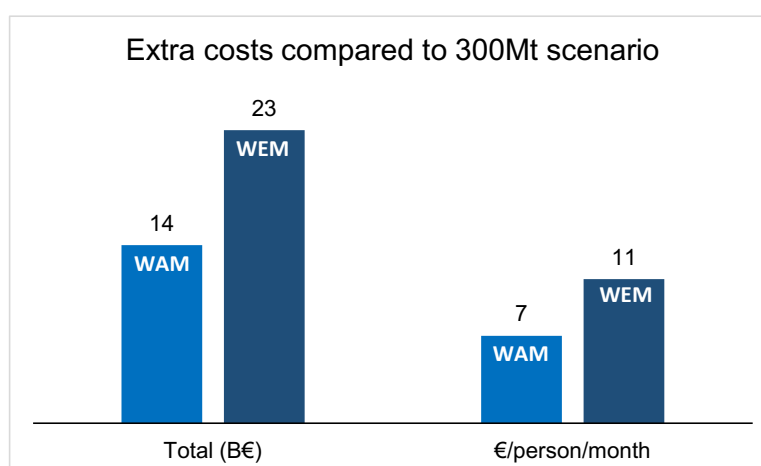


FIGURE 7: ADDITIONAL COSTS (CUMULATIVE DISCOUNTED ENERGY SYSTEM COSTS, 2021-50) ASSOCIATED WITH WEM AND WAM RELATIVE TO 300MT SCENARIO.

3.2 IMPACT OF WEM AND WAM

This section describes the implications for different carbon budget cases of following a “current policy” trajectory in the period to 2030. It finds that following mitigation trends implied by existing and additional policies (as depicted in the WEM and WAM scenarios) significantly increases the infeasibility of delivering overall carbon budgets.

In WEM and WAM, 324 MtCO₂ and 311 MtCO₂ are emitted cumulatively from 2021-30 respectively, significantly overshooting the Sectoral Emissions Ceiling for the energy system in that period (275 MtCO₂), and overshooting the total 2021-50 target carbon budget in the 250Mt and 300Mt cases already by 2030. Because the Climate Act requires that any overshoot in one carbon budget period must be subtracted from subsequent periods (to maintain a total overall carbon budget), following a WEM or WAM pathway leaves vanishingly small carbon budgets after 2030, and would require both infeasibly steep mitigation in the 2030s and significant CDR.

Figure 8 illustrates the implications of the WEM and WAM scenarios on emissions reduction in the 250Mt case - near-vertical emissions reduction post-2030 – the scenarios need to achieve annual GHG reductions of 27% and 26% respectively each year between 2030 and 2033. The feasibility of this trajectory has not been examined in detail, and should not be considered a plausible scenario.

WEM and WAM significantly increase the scale of emissions the model cannot find a mitigation solution for (right panel in Figure). These grow from 32 MtCO₂ in the core case to 73-89 MtCO₂ under WAM and WEM.

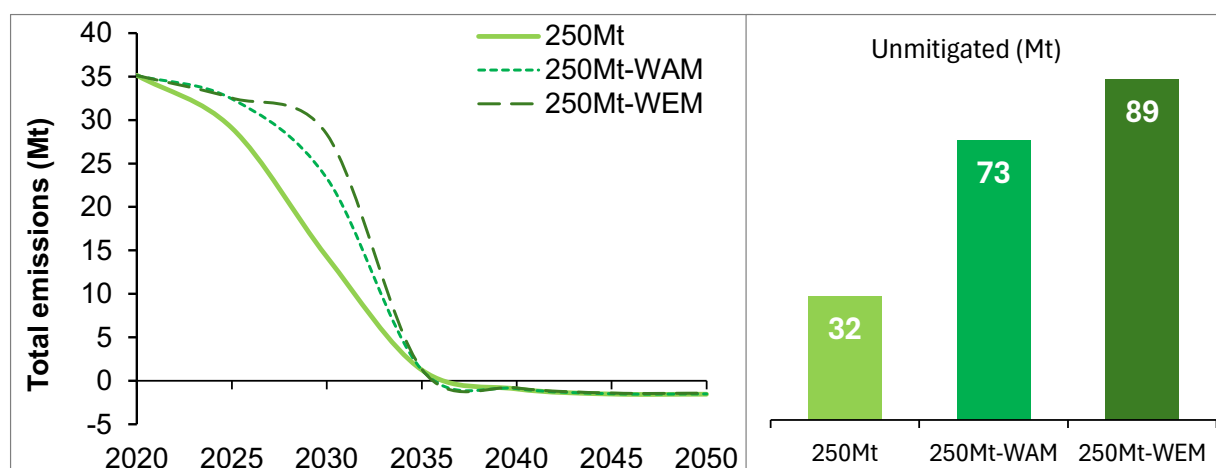


FIGURE 8: IMPACT OF WEM AND WAM ON EMISSION MITIGATION (LEFT) AND UNMITIGATED EMISSIONS (RIGHT) UNDER 250MT SCENARIO

In other carbon budget cases, following WEM and WAM pathways to 2030 creates similar dynamics and issues: limited emissions reductions pre-2030 requires a radical decline post-2030, and greater levels of unmitigated emissions.

For example, while the model can deliver mitigation options to fully meet the carbon budget in the core 300Mt case, following WAM and WEM in the period to 2030 leaves 23 Mt and 39 MtCO₂ of unmitigated emissions in these cases.

Following WEM and WAM to 2030 brings forward the timeline for achieving net-zero emissions by 5 to 8 years. This suggests that failure to accelerate emissions cuts during the current decade and to meet or exceed SECs will necessitate unprecedented emissions reductions after 2030, pushing forward net-zero targets, and substantially increasing unmitigated emissions.

It is crucial to emphasise that TIM overestimates the feasibility of achieving these rapid GHG reductions between 2030 and 2035. This raises concerns about the realistic ability to meet such steep emissions reductions within this timeframe, emphasising the critical need for rapid climate action in the near term to avoid over-reliance on infeasible post-2030 reductions and reliance on risky and costly CDR measures.

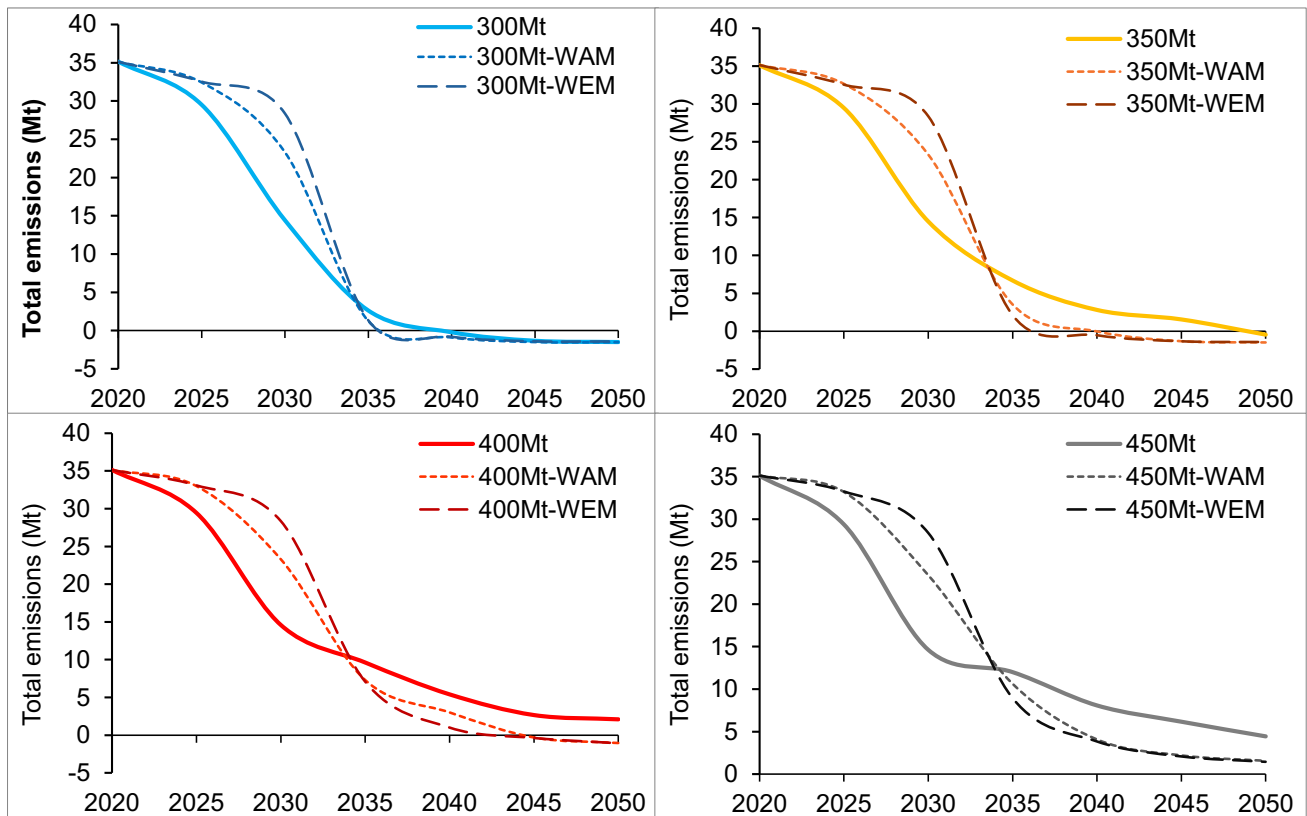


FIGURE 9: IMPACT OF WEM AND WAM ON EMISSION MITIGATION FOR OTHER CORE SCENARIOS

3.3 IMPACT OF LOW ENERGY DEMAND (LED)

The Low Energy Demand (LED) case allows the most ambitious carbon budget – 250Mt – to be fully delivered with no unmitigated emissions. It enables this by increasing the feasibility of faster emissions reductions particularly in the first and second carbon budget periods (2021-30). Figure 10 shows cumulative emissions in 250Mt-BAU – which overshoots the total carbon budget by 2028 and is unable to recover from this overshoot with CDR by 2050. The 250Mt-LED case overshoots the carbon budget later, after 2030, and by a lower amount, and is able to return to the total budget with CDR (via BECCS) by 2050.

LED measures allow more ambitious carbon budgets to be met, and allows mitigation to be met with less rapid deployment of mitigation measures, and with lower reliance on more speculative measures or those which have a higher risks of negative trade-offs, such as BECCS and hydrogen.

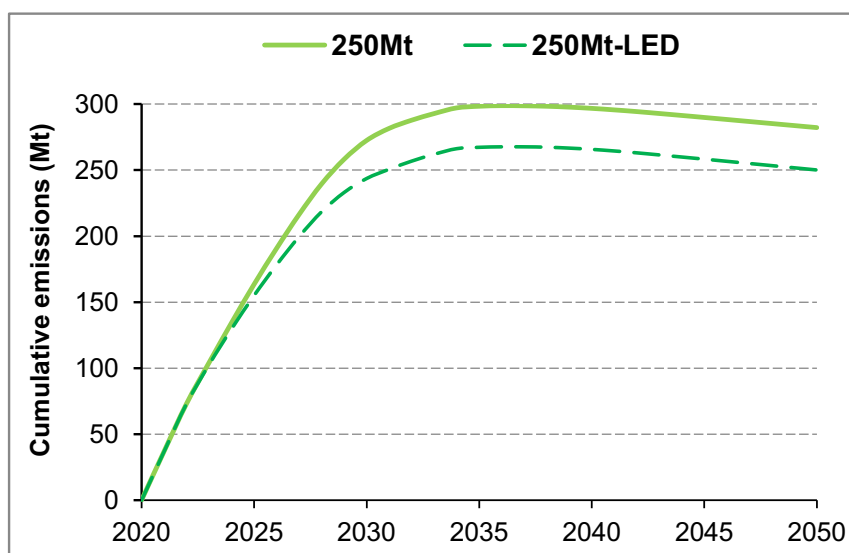


FIGURE 10: CUMULATIVE EMISSIONS IN 250MT-BAU AND 250MT-LED

Figure 11 shows total CO₂ reductions relative to 2018 in each scenario. Total emissions in 2030 fall by 62-72%, which is significantly higher than currently policy is planning to deliver. By 2040, emissions in six out of the eight carbon budget scenarios fall by more than 90%, and in three already reach net-negative.

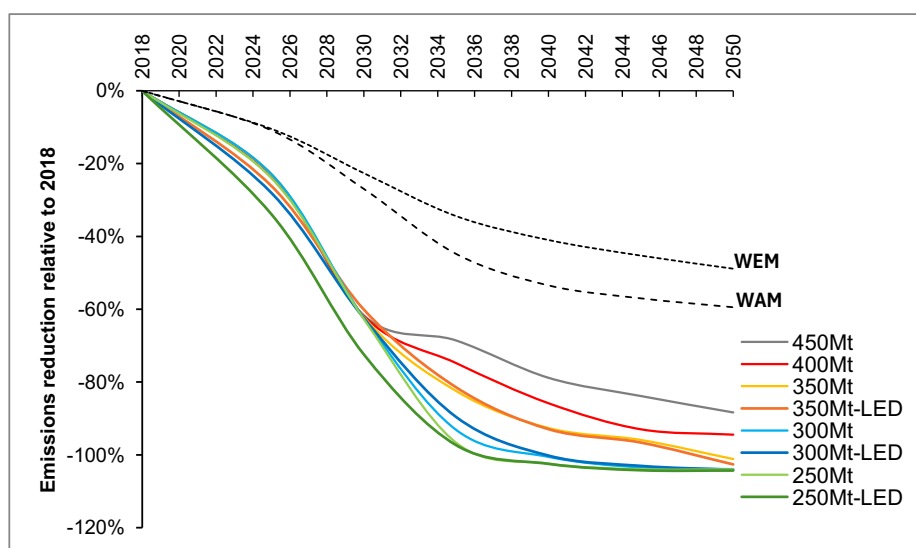


FIGURE 11: TOTAL CO₂ EMISSIONS REDUCTIONS RELATIVE TO 2018 BY SCENARIO

3.4 KEY INDICATORS IN 2040

Table 1 details key indicators in 2040, including annualised and cumulative cost, gross and net CO₂ emissions and reductions in energy-related CO₂ emissions relative to 2020.

	250Mt- BAU	250Mt- LED	300Mt- BAU	300Mt- LED	350Mt- BAU	350Mt- LED	400Mt- BAU	450Mt- BAU	WAM	No Mitigation
2040 Annualised System Costs (B€ 2018)	25.9	19.8	25.3	19.1	24.5	18.3	24	23.9	23.9	23.2
Cost as % of 2020 GDP	2.3%	1.7%	2.2%	1.7%	2.2%	1.6%	2.1%	2.1%	2.1%	2.0%
2031-2040 Cumulative System Cost (B€)	235	190	229	180	224	174	221	219	217	212
Gross Domestic CO ₂ Energy Emissions (Mt)	0.9	0.9	1.6	1.7	2.8	2.7	5.4	8.1	14.6	13.0
Carbon Dioxide Removal from Energy Sector (Mt)	-1.8	-1.8	-1.8	-1.8	0	0	0	0	0	0
Net Domestic CO ₂ Energy Emissions (Mt)	-0.9	-0.9	-0.2	-0.1	2.8	2.7	5.4	8.1	14.6	13.0
Energy CO ₂ Reduction Relative to 1990	103%	103%	101%	100%	91%	92%	83%	75%	55%	60%

TABLE 1: KEY INDICATORS ACROSS SCENARIOS IN 2040

4 MITIGATION MEASURES

Figure 12 compares the average sectoral allocation of the carbon budget during the study period in core scenarios with actual emissions in 2018. The transport and economic sectors require a larger share of the budget than their share in 2018, because of the longer turnover of fossil fuel equipment in those sectors and a delay in deploying mitigation measures due to greater cost. This suggests that hard-to-abate sectors need more focused efforts to achieve significant emissions reductions. Moreover, significant reductions in power sector emissions will be required by fundamental transformations and significant development of renewable energy sources. A lower level of emissions in the residential sector highlights significant potential for further reductions through energy efficiency measures and electrification.

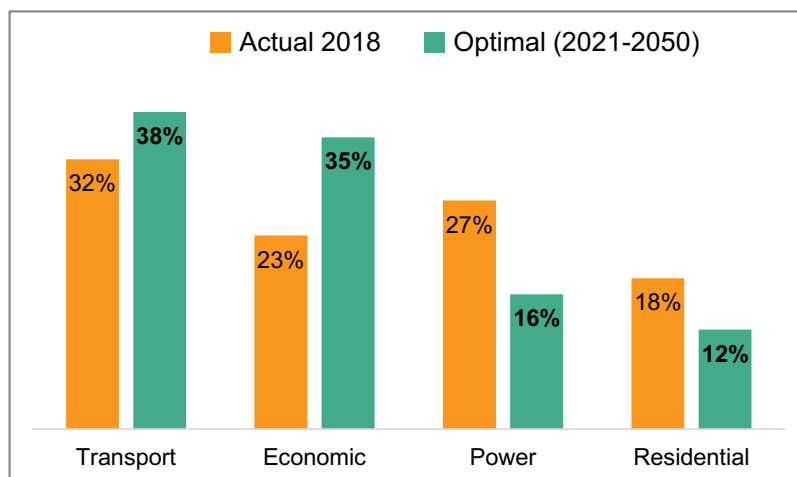


FIGURE 12: OPTIMAL SECTORAL ALLOCATION DURING THE STUDY PERIOD VERSUS ACTUAL EMISSIONS DISTRIBUTION IN 2018. ECONOMIC INCLUDES INDUSTRY (BOTH COMBUSTIONS AND PROCESSES), AGRICULTURE (FUEL COMBUSTION), AND PUBLIC SERVICES

4.1 POWER SECTOR

Electrification, along with decarbonisation of power generation, is the main decarbonisation lever in all scenarios. GHG emissions in the power sector fall below 2 MtCO₂ in 2030 in all cases and thereafter either turn negative before 2030 (in the 250Mt and 300Mt cases) (Figure 13).

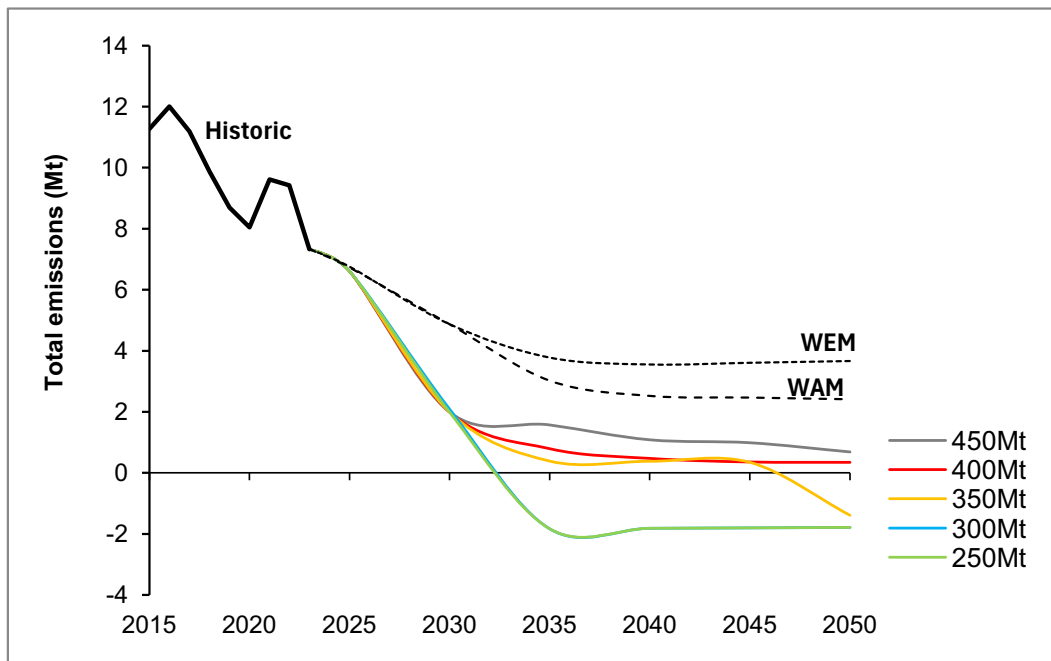


FIGURE 13: POWER SECTOR EMISSIONS IN CORE SCENARIOS

Electricity demand as a share of total final energy consumption (excluding jet kerosene) grows from 22% in 2020, to 41% in 2030, and 69% in 2040. Because electricity end uses are far more efficient than applications based on combustion, such as biofuels, electricity demand represents an even greater share of useful energy demand for transport, buildings and industry. By 2040, electricity represents 86% and 72%¹ of energy demand in domestic transport and residential buildings respectively, and 62% of industrial energy. This is driven by a transformation in power generation capacity, towards renewables and some limited biomass, and in vehicle and home heating technologies.

4.1.1 POWER GENERATION MIX

The power generation mix in each scenario can be viewed on the results portal ([link](#)). Power generation from variable renewable energy sources (wind and solar PV) strongly grows in all scenarios – by more than a factor of 4 between 2020 and 2030 in many cases. Even higher shares of renewable electricity in the generation mix are featured in 2030 – above 90% - than the level targeted in the Climate Action Plan (80%). This allows for the both the decarbonisation of the power sector and also the expansion of power generation.

The composition and scale of renewable installations varies significantly between cases: For example, 39 GW of total power generation capacity is installed in the *300Mt-BAU* scenario versus 30 GW in *300Mt-LED* in 2050. The difference is driven by 6 GW more offshore wind capacity, 2 GW of natural gas generation capacity, and 1 GW of additional hydrogen capacity in the BAU demand case.

The LED cases require lower power generation capacity. For example, *350Mt-BAU* requires 1.4 GW of hydrogen-based capacity and about 3 GW of other technologies (mostly gas-fired power generation and BECCS), significantly more than the *LED* scenario. However, additional analysis is necessary to fully explore the role of these (and other) technologies in the power system, as TIM is not designed to model in detail its operation, including investment in grids, storage and flexibility. Moreover, only energy demand for domestic demand is factored in: no exported energy is assumed, beyond that exported in currently planned interconnectors, and the potential power demand for Direct Air Capture (DAC) and e-kerosene is not assessed.

¹ Excluding ambient heat

Emissions turn negative in the power sector in some cases due to the installation of a 500 MW Biomass with Carbon Capture and Storage (BECCS) power plant, which is in operation by 2035. This generates around 2-3% of total electricity and is responsible for 1.8 MtCO₂ of carbon removals annually in these cases. Biomass feedstock is discussed in section 4.2.

The results portal also includes a “*HighSolarPV*” sensitivity case which enables greater levels of solar PV capacity than is assumed in core scenarios. In these cases, solar PV capacity grows to 16.8 GW in 2030 and 18 GW in 2040, while in core cases it is capped at 8 GW in 2030 and 10 GW in 2040. This *HighSolarPV* case enables greater electrification of end-use sectors, more rapid phase-out of natural gas and lower unmitigated emissions in the 250Mt case ([link](#)).

4.1.2 ELECTRICITY DEMAND

Figure 14 and Figure 15 display the total electricity generation by source and consumption by sector in 250Mt-LED and 450Mt-BAU scenarios. Both BAU and LED scenarios require very significant demand growth, as electrification is the main decarbonisation lever in end-use sectors. Growth in electricity demand from data centres is a strong driver of electricity demand in all cases.

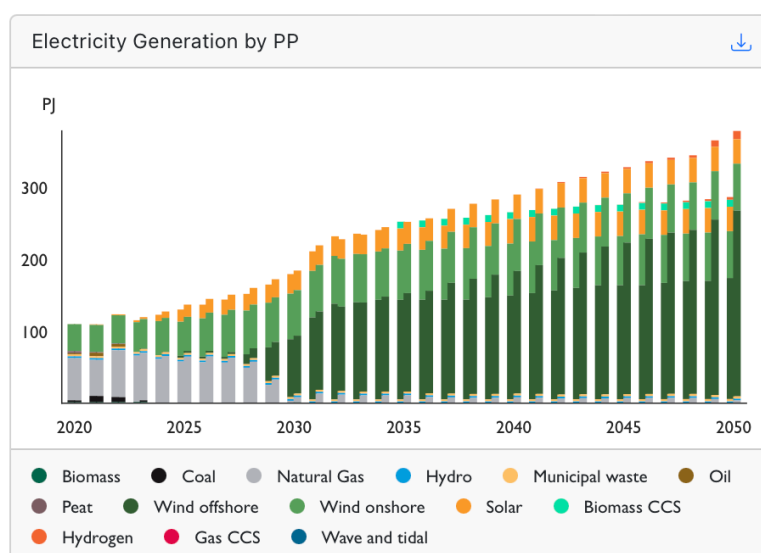


FIGURE 14: TOTAL ELECTRICITY GENERATION BY SOURCE, 250MT-LED AND 450MT-BAU SCENARIOS ([LINK](#))

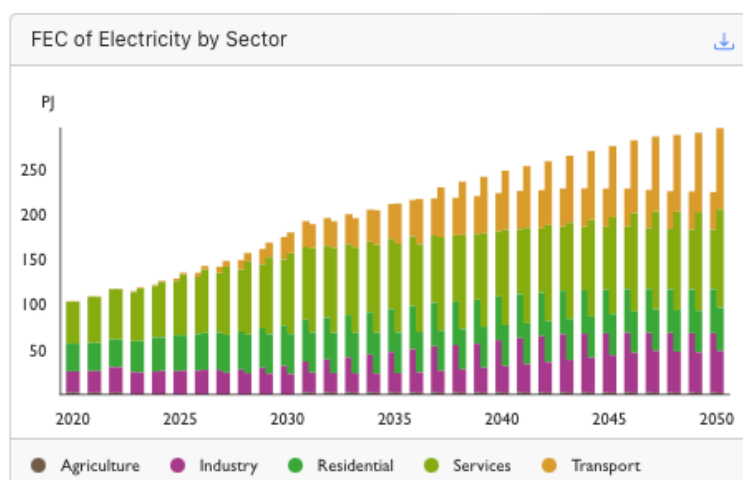


FIGURE 15: FINAL ENERGY CONSUMPTION OF ELECTRICITY BY SECTOR, 250MT-LED AND 450MT-BAU SCENARIOS ([LINK](#))

4.2 BIOENERGY

Bioenergy primary energy demand grows to around 20 TWh in 2030 in the *350Mt-BAU* scenario, more than doubling the level from 2020¹. Of this demand, 3.2 TWh is for biogas, which is all used in the industry sector, 7.5 TWh is for biodiesel and ethanol, which is used in the transport sector in the period to 2030, and then to a limited extent also in the residential sector, 3.7 TWh is for solid biomass, mainly in the industrial sector. LED scenarios and less stringent carbon budget scenarios require lower bioenergy across the energy system.

Detailed assumptions underpinning this sector are described in Appendix 3. Bioenergy and biomass supply limits and costs are derived from the SEAI Heat Study Bioenergy for Heat report for domestic bioenergy sources². While bioenergy is treated in TIM as a zero carbon fuel (following the GHG inventory), there is a greater risk of causing indirect GHG emissions and other negative impacts from biofuels than other mitigation options. Low risk biomass resources include those coming from domestic waste, such as food waste and animal manure. Higher sustainability risks arise from dedicating land to grow crops to produce bioenergy, including grass for the production of biogas. Importing wood pellets from outside Europe, growing grass with current cultivation practices, and relying on imported vegetable oils for bioenergy present particularly high sustainability risks. To limit the potential negative consequences of using bioenergy for GHG mitigation, this report has taken a precautionary approach and limited the potential import of biomass, and limited the total capacity for Biomass with Carbon Capture and Storage (BECCS) to 500 MW.

A sensitivity case, *LowBio*, is also included, where there is no increase in bioenergy demand relative to 2020, in order to explore the implications across the energy system of limiting bioenergy imports. Unabated emissions rise by 11 MtCO₂ – this could be offset by greater speed in deploying renewables, such as solar PV, or end-use electrification measures.

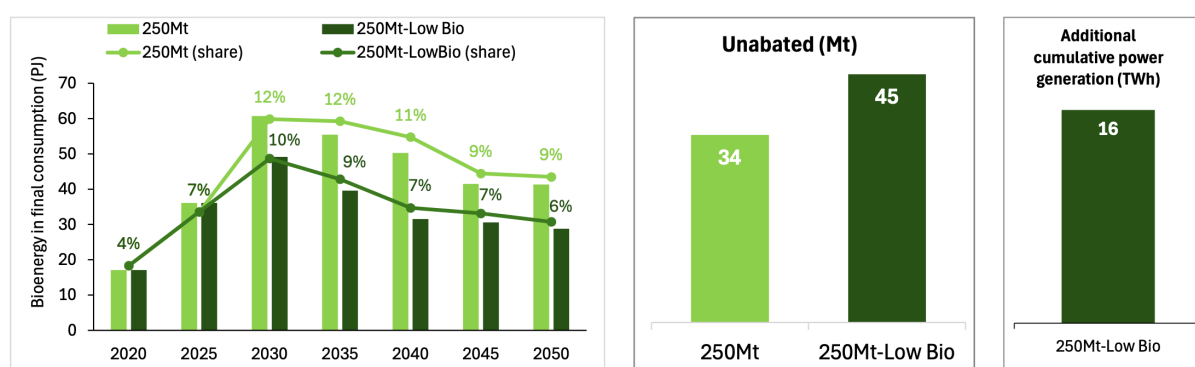


FIGURE 16: IMPLICATIONS OF *LOWBIO* CASE IN 250MT CARBON BUDGET: LOWER BIOENERGY SUPPLY INCREASES UNABATED EMISSIONS AND REQUIRES GREATER ELECTRIFICATION.

4.3 TRANSPORT

The transport sector decarbonises rapidly in all carbon budget scenarios, and reaches close to zero by 2040 (Figure 17). This is achieved through near full electrification of all vehicles by 2040, which requires an end to the sale of new internal combustion engine (ICE) vehicles by 2025 for private vehicles and 2027 for freight vehicles. Even in the absence of any climate policy, TIM finds that full vehicle electrification is the lowest cost energy system - no new private ICE vehicles are sold from 2027 or light goods vehicles by 2028 in the “*NoMitigation*” scenario, because EVs already cost less on a total cost of ownership basis than ICE vehicles in many cases. More stringent carbon budgets bring forward the full electrification date for goods vehicles. *LED* scenarios, which

¹ Results relating to bioenergy can be found in the results portal at the following links:

Primary energy demand: [Link](#); Final energy consumption by fuel and sector: [Link](#); Bioenergy supply: [Link](#).

² <https://www.seai.ie/renewable-energy/bioenergy/biomass-in-ireland/>

lower the dependence on private cars and reduces freight vehicle movements, allow a later phase out of new fossil-fuelled vehicle sales.

Full results on new vehicle sales and stock can be explored at the following [link](#).

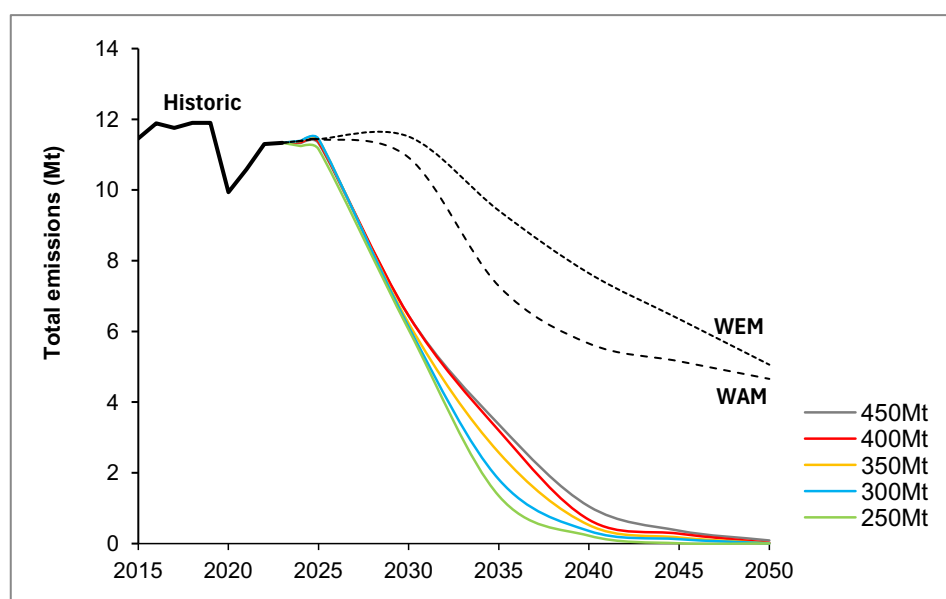


FIGURE 17: CO₂ EMISSIONS IN THE TRANSPORT SECTOR

4.4 BUILDINGS

Electrification through heat pumps (facilitated by reducing the heat loss of building fabric) is the main mitigation pathway across all scenarios ([link](#)). Figure 18 shows mitigation pathways for carbon budgets in this sector, which diverge strongly from the WEM and WAM scenarios. Such rapid mitigation is delivered in the model because the most carbon-intensive buildings, especially detached buildings, are targeted with retrofitting measures first – the use of coal and peat end immediately, and the use of kerosene for heating is mostly phased out by 2030. Heat networks play an increasingly important role after 2030, in apartments and in attached homes. In scenarios with a higher carbon budget, some natural gas remains until 2040, but in more ambitious scenarios it is phased out in the early 2030s along with other fossil fuels. The model indicates a possible role for biogas in some scenarios after 2035 – for example, it provides 7% of energy for heating in 2050 in the 300Mt case - however this requires careful analysis on the cost and feasibility of maintaining supply infrastructure, which is not within TIM’s scope. New research using TIM indicates that lowering the threshold for heat loss before supporting heat pumps can facilitate more rapid energy transition at lower cost¹

1

https://www.sciencedirect.com/science/article/pii/S0378778824004997?ssrnid=4644106&dgcid=SSRN_redire ct_SD

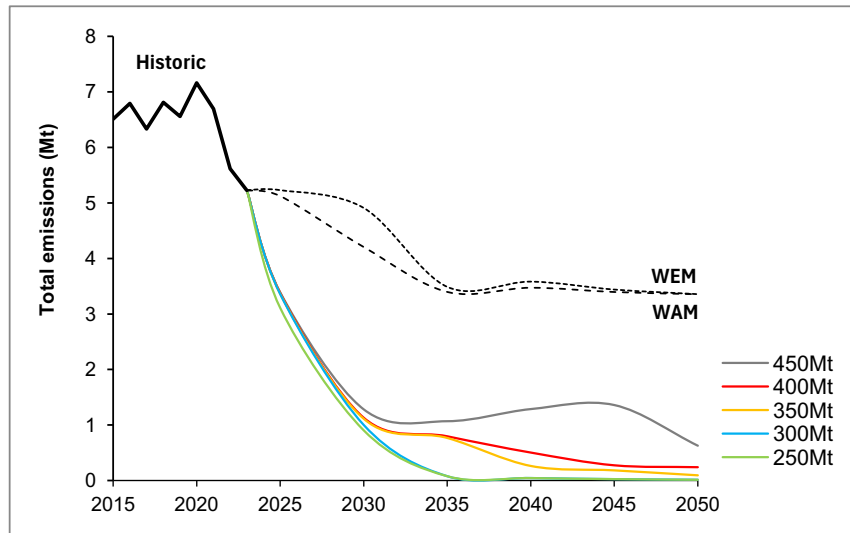


FIGURE 18: CO2 EMISSIONS IN BUILDINGS

4.5 INDUSTRY

The main mitigation levers in the industrial sector are direct electrification of most heat levels, apart from high-temperature process heat, which relies on biomass and wastes. Fuel switching from natural gas to biogas and from solid fuels to solid biomass are transitional measures in the short- and mid-term. Additionally, carbon capture and storage (CCS) installation in cement manufacturing, is deployed to decarbonise the process emissions from this process. With smaller carbon budgets, CCS technology is deployed earlier. For example, in the 450Mt scenario, this CCS technology is not deployed while in the 400Mt scenario it is deployed from 2045 and in other carbon budget scenarios it is used from 2030.

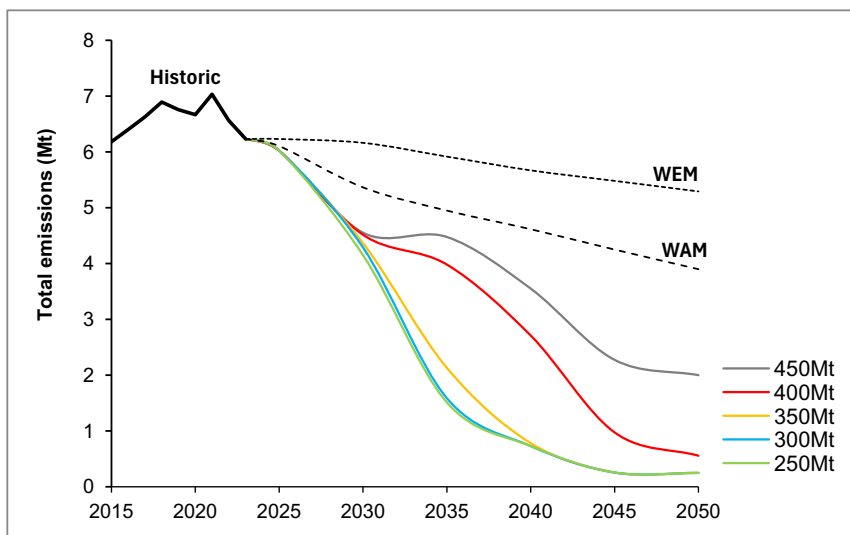


FIGURE 19: MITIGATION PATHWAYS IN THE INDUSTRIAL SECTOR

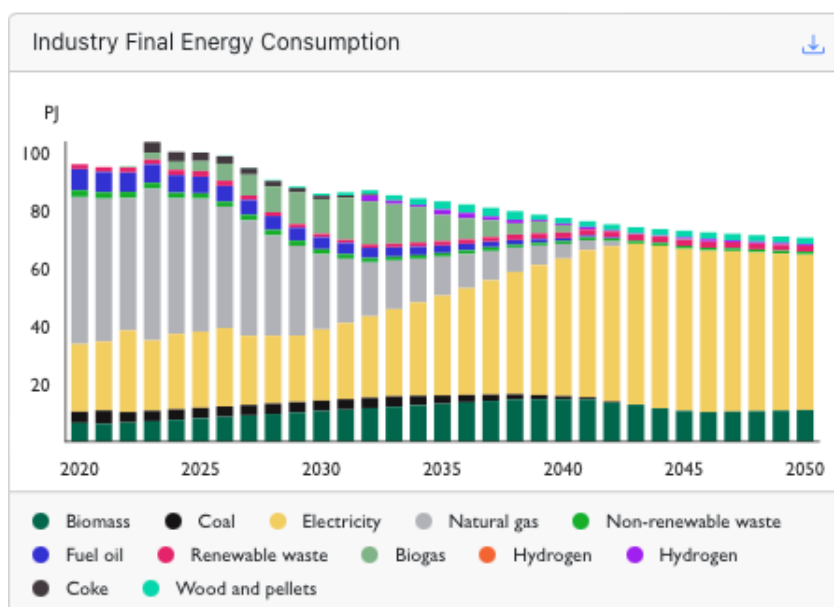


FIGURE 20: FINAL ENERGY CONSUMPTION IN THE INDUSTRIAL SECTOR, 2050MT-BAU ([LINK](#))

4.6 RELIANCE ON CARBON DIOXIDE REMOVAL (CDR)

Many scenarios rely to some extent on carbon removals¹, either through Biomass with Carbon Capture and Storage (BECCS), which is modelled explicitly, or other forms of carbon dioxide removal (CDR), which are not explicitly modelled. Greater levels of carbon removals are required in scenarios with greater mitigation ambition (i.e., lower carbon budgets), and in scenarios with higher early overshoot of carbon budgets to 2030 (WEM and WAM cases), and with higher final energy demands. Reliance on removals brings significant risks and trade-offs, including the risk of failure for the technology to be developed or be deployed, the permanence of removals, financial cost and conflicts with biodiversity and land use. Pursuing mitigation strategies that lower dependence on CDR is important to manage these risks, through strong early mitigation efforts in the period to 2030, lowering energy demands. CDR can be thought of as a risky and costly fall-back option if present mitigation efforts fail, not as an alternative to mitigation now. A careful assessment of the sustainability and opportunity cost of BECCS feedstock is necessary. Importing biomass to deliver CDR in Ireland risks driving GHG emissions elsewhere in the world. Despite these caveats, this analysis indicates that some amount of CDR must be explored to limit and reverse the overshoot of global temperature rise above the Paris Agreement commitments on an equitable basis.

Ireland is likely to need to develop negative carbon budgets, for two reasons. Firstly, it is likely that the Paris Agreement's 1.5C temperature threshold will shortly be passed, or has already passed. Greater peak warming risks triggering irreversible feedbacks and tipping points in critical planetary systems. Secondly, unless there is an urgent course-correction, current policies and trends deviate significantly from carbon budgets 1 and 2, and any overshoot in those budgets must be compensated for in subsequent budget periods. The scale of the projected overshoot is greater than the diminishingly small carbon budgets in later carbon budget periods,

¹ "Carbon removals" refers to technologies, practices and approaches that remove and durably store carbon dioxide from the atmosphere. Such Carbon Dioxide Removal (CDR) or Negative Emissions Technologies (NETs) can entail measures in LULUCF, such as afforestation and peatland rewetting, or the deployment of novel technologies such as Direct Air Capture (DAC). Biomass with Carbon Capture and Storage is the only CDR technology that is explicitly modelled in TIM – others are represented using a generic "backstop" carbon removal technology costing €2000/tCO₂.

leaving a negative budget. Several countries have set net-negative targets, and researchers have proposed “carbon removal budgets”¹.

5 BENCHMARKING AGAINST EU 2040 TARGET

The EU has set a target to reduce net GHG emissions by at least 55% relative to 1990 levels for 2030. Recently, the [European Commission](#) recommended a 2040 climate target, proposing a 90% reduction in net GHG emissions by 2040 relative to 1990 levels. The EU has not formally adopted this target, nor has it indicated how Member States will be allocated different targets, or whether sectors will be treated differently. In this section, we benchmark carbon budget scenarios for this report against illustrative targets which may be applied to Ireland’s energy system in 2040.

Emissions from the Irish energy system were 32 MtCO₂ in 1990. If a 90% reduction target was applied to energy system CO₂ only, this would require emissions to fall to 3.2 MtCO₂ in 2040. Figure 21 illustrates emissions reduction pathways from the energy sector across the carbon budget scenarios modelled for this analysis compared to illustrative targets from 85% to 90% based on the energy system’s CO₂ emissions in 1990. The most ambitious carbon budget scenarios – 250Mt-LED and 250Mt-BAU – meet the 95% reduction target in 2035, while the least ambitious carbon budget scenario – 450Mt-BAU – meets the 80% reduction target in 2044.

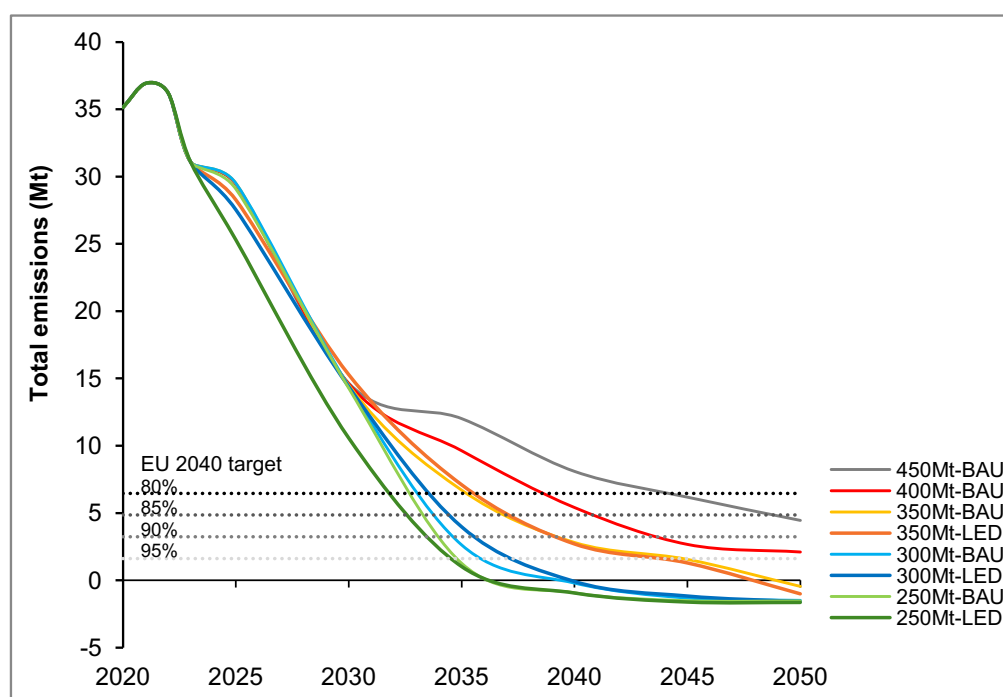


FIGURE 21: CARBON BUDGET SCENARIOS BENCHMARKED AGAINST ILLUSTRATIVE GHG REDUCTION TARGETS (RELATIVE TO GHG EMISSIONS IN THE ENERGY SECTOR IN 1990)

6 PRACTICAL IMPLICATIONS, POTENTIAL PITFALLS AND CHALLENGES

6.1 KEY FINDINGS

Key findings are as follows:

¹ Caldecott & Johnstone, 2024. The Carbon Removal Budget: theory and practice
<https://doi.org/10.1080/17583004.2024.2374515>

- Net-zero is a critical milestone, but cumulative CO₂ emissions determine total global warming. For this reason, Ireland's climate ambition is framed as cumulative carbon budgets. Planning the sustainable energy transition to deliver net-zero by 2050 is not sufficient: the pathway and timing of net-zero in each sector, and delays in delivering mitigation will instead determine success. Understanding this difference is critical for appreciating the scale of Ireland's mitigation challenge. Consequently, it is likely that emissions from Ireland's energy system must fall to net-zero, or close to zero, well before 2050, and thereafter turn negative. For example, this report shows that carbon budgets aligned with the most ambitious contribution to climate action globally would require existing carbon budgets in the period to 2030 to be reduced, and for Ireland's energy system to achieve net-zero by around 2035, as well as delivering significant cuts in non-CO₂ emissions. Moreover, if emissions overshoot committed and legislated carbon budgets in the period to 2030 (as indicated by projections based on current and planned policies), this overshoot must be compensated for by reducing carbon budgets in subsequent periods. The scale of projected carbon budget overshoot would leave little-to-no carbon budget left following 2030, even under moderate ambition.
- All scenarios detail significantly greater greenhouse gas emissions cuts in the period to 2030 and 2040 than planned under current policies. An immediate acceleration in implementing mitigation measures is necessary to close this gap. Making up for this overshoot in the long-term may not be feasible, and would lead to an increase in overall costs and negative trade-offs for land use.
- The most ambitious carbon budget modelled for this study (250Mt) can be delivered with a very modest increase in total annualised expenditure relative to a "NoMitigation" scenario – only 0.3% of GDP in 2020 – because mitigation solutions cut the demand for expensive fossil fuels. Significant upfront investment is required, but this is largely cost effective and paid back through a reduction in fossil fuel imports. Significantly, the "With Additional" and "With Existing Measures" cases are more costly than "NoMitigation" cases, and are more costly than several carbon budget scenarios, because they do not phase out fossil fuels in favour of less costly (and lower emitting) fuels.
- A near-complete phase-out of all fossil fuels required is required in the period to 2030 to 2040 for power, buildings and transport in the majority of scenarios. The phase-out of coal and oil is urgent. From now, there is nearly no remaining carbon budget for additional investments in fossil fuels, such as internal combustion engine vehicles. This also has implications for natural gas infrastructure, for which a decommissioning plan is required.
- Electrification of transport, heat and industry, complemented by decarbonising electricity supply, are the main mitigation levers. While this energy transition requires significant upfront investment, and brings new risks and challenges, the falling cost of renewables and batteries, and the social, health, energy security and economic benefits, makes it cost effective. Greater climate ambition lowers the damage caused by greenhouse gas emissions and reduces exposure to fossil fuel supply disruptions. While this report quantifies the cost of greater climate ambition, the benefits of earlier fossil fuel phase-out for energy security, economic sectors, air pollution and household energy bills are not quantified, but are likely to be substantial.
- The feasibility of delivering the scenarios described in this report relies on political, societal and institutional capacity. With some exceptions, the technologies and measures necessary to cut emissions are available, mature, cost-effective and well tested. Time, not technology, is the main challenge. The following are some of the main technical challenges associated with delivering these pathways:
 - Operation of the power system with very little natural gas (and other fossil fuels) by the early 2030s: Moreover, total electricity demand grows at an unprecedented rate in all scenarios to meet the need to electrify transport, heating and industry.
 - This will require significant innovations and investment in the power system, including in developing short- and long-duration energy storage, strategic annual storage, flexibility and interconnection, and investment in electricity transmission and distribution. Technologies that are currently nascent and an evolution of electricity markets are necessary to realise this level and pace of decarbonisation.

- Lowering final energy demands makes the most ambitious climate scenarios more feasible than a strategy that relies on technology transitions alone, and can bring additional co-benefits. This can be achieved by reducing dependence on private cars, promoting greater housing density, wasting less energy in buildings and industries, and lowering reliance on carbon-intensive materials such as cement. While these changes will require individuals to change some of their daily practices, this “behaviour change” requires significant state investment and regulation, and the provision of information, to change the choice architecture – such improving public transport provision - to facilitate lifestyles that require lower final energy.
- Many scenarios rely to some extent on carbon removals, either through Biomass with Carbon Capture and Storage (BECCS), which is modelled explicitly, or another form of carbon dioxide removal (CDR), which is not modelled. More carbon removals are required in scenarios with greater mitigation ambition, with higher early overshoot of carbon budgets to 2030, and with higher final energy demands. Reliance on removals brings significant risks and trade-offs: technologies are not proven at scale, and if implemented at scale are likely to come with either significant land-use change implications (in the case of BECCS) or energy demands (in the case of Direct Air Capture), as well as uncertain costs. These risks can be limited through strong early mitigation and lowering demands. Careful assessment of the sustainability and opportunity cost of BECCS feedstock is necessary. Meanwhile, this report indicates that carbon dioxide removal options must be explored to limit global temperature rise to the Paris Agreement commitments.
- These scenarios indicate that buildings and transport should be close to fully decarbonised by the early-to-mid 2030s. This can be achieved through accelerating the pace and scale of decarbonisation measures outlined in the Climate Action Plan: efficiency, retrofitting, district heating and electrification. More ambitious climate scenarios require a more rapid phase-out of natural gas heating systems and of freight vehicles and vans using oil. All scenarios require a very rapid transition away from oil-based central heating systems and heating with coal and peat.
- Moreover, all scenarios see the end of sales of new internal combustion engine private cars sales by 2025, which is significantly misaligned with current trends. This highlights how new investments in technologies dependent on fossil fuels from now have a significant bearing on delivering on carbon budgets, even beyond 2035: New investments either lock in greenhouse gas emissions, or else will become stranded assets as they are retired early. Either the State or private individuals will have to bare this cost.

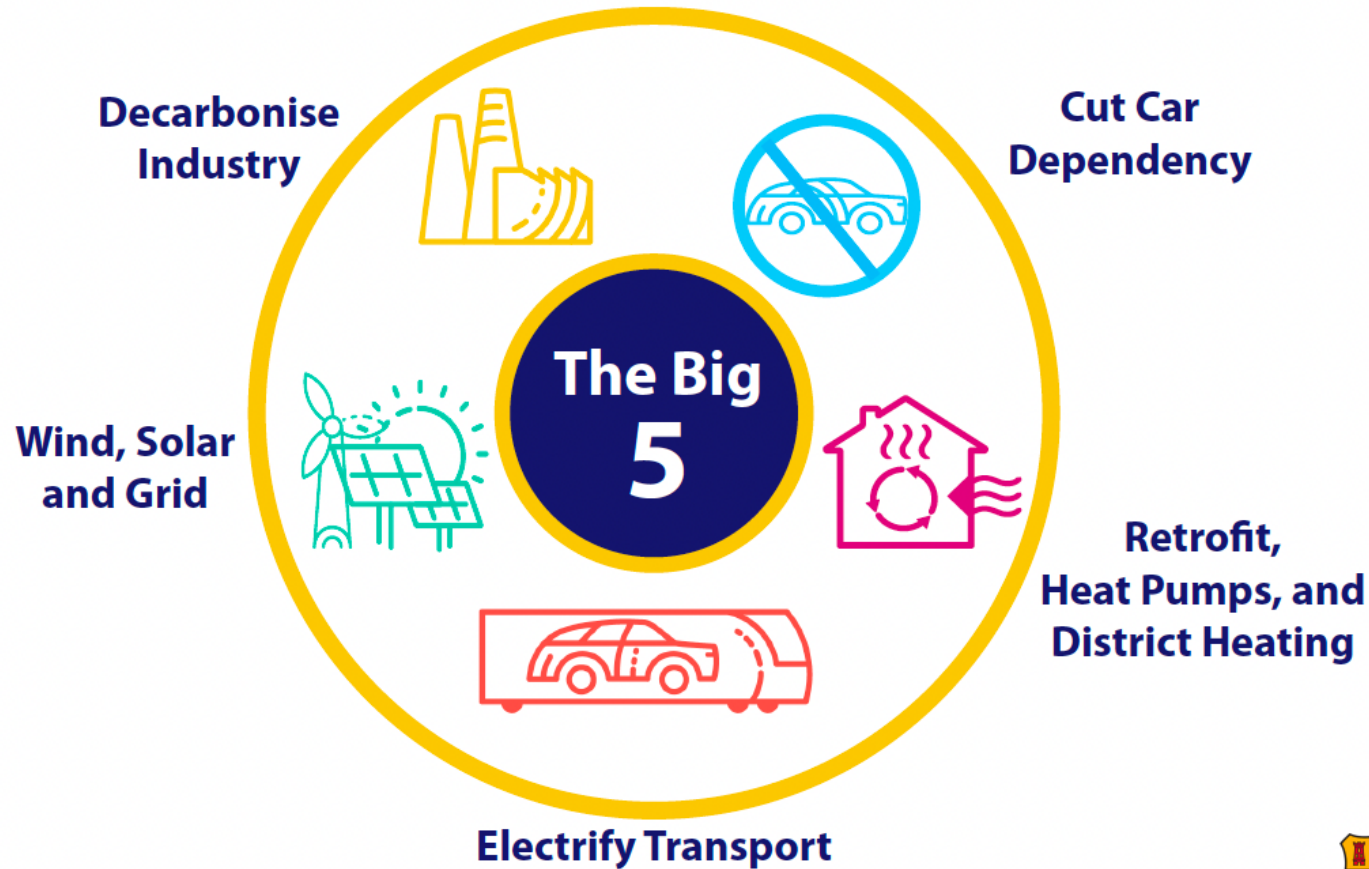
6.2 FEASIBILITY & PRACTICAL IMPLICATIONS

The energy transition depicted in these scenarios requires more rapid deployment of measures and new technologies than Ireland has achieved in history. However, this does not imply these scenarios are infeasible. Feasibility is a function of the technical readiness of technologies – whether they are available on the market, including supply chain constraints – as well as societal readiness, political commitment, institutional capacity and the readiness of infrastructure. Broadly speaking, the majority of the mitigation measures and technologies depicted in these scenarios are already available, and are currently undergoing exponential growth globally. There are many examples of rapid energy transitions throughout history. Overcoming the barriers to a rapid energy transition is necessary to enable the scenarios depicted in this report. This transformation can be catalysed by political leadership, social movements and disruptive events (such as the war in Ukraine). At the same time, societal forces can also work against the delivery of these climate mitigation pathways.

The following summarises the main practical implications of delivering rapid energy transitions:

- Physical infrastructure: Expanding and upgrading the power grid and investing in flexibility, storage across timescales and interconnection; building district heating networks, public transport networks
- Planning: The speed at which the planning system can approve
- Human resources and skills: Upskilling workers to deliver the energy transition while providing retraining and support for workers transitioning from roles; human resource throughout public system, including planning, civil service, local authorities and education.
- Market design: Redesigning the power market to reward flexibility and storage
- Equity and building public support: Explaining the “how and why” of the energy transition to the public; avoiding backlash by designing the energy transition to deliver multiple benefits and communicating this clearly to the public. Designing energy transition measures in an equitable way, as an end in itself and to increase public acceptance of the necessary changes.
- Finance: The overall cost of the energy transition is manageable, and in many cases will come with net savings, but significant upfront cost is necessary across all sectors to transform the energy system, which must be financed, while capital is redirected from harmful activities.
- Environmental management: Mitigating potential environmental impacts of renewable energy.
- Innovation in industry: Developing cleaner production methods and processes in energy-intensive industries like cement.

Five Actions for 90% Energy Emissions Savings to 2030



Ireland's transformation to a clean and sustainable energy system: Why and how?

Purpose

Ireland's legally-binding carbon budgets require a rapid reduction in fossil fuel use, which accounts for around 60% of greenhouse gas emissions. This briefing note **describes the main measures necessary to cut fossil fuel use in line with carbon budgets by 2030**, and focuses on the **five measures that deliver 90% of the GHG savings from the energy system by 2030**, required by the Climate Action Plan.

The most important factor for Ireland to meet its climate commitments this decade is to immediately accelerate the pace and scale of delivering these five measures.

These five solutions are available now, scalable, well understood, and have international precedent. Accelerating their deployment, while also cutting the use of fossil fuels and managing energy demand, is essential.

Political leadership is crucial to sustain public support for these essential measures. Both traditional and modern ways of selling messages should be used to further this.

The urgency of action

The legacy of leaders depends on how they act now:

The decisions that leaders across politics, society, industry and government take now will determine the prosperity and wellbeing of current and future generations. According to projections of greenhouse gases, Ireland will breach legally-binding carbon budgets and international obligations unless **an urgent and significant course correction is taken to align with these commitments.**

Time, not technology, is the main barrier. No miracles are necessary: the vast majority of emissions savings required in the energy system this decade can come from **wind, solar and the electricity grid, electric vehicles, heat pumps and reducing car demand.** Any further delay to these measures will cause an overshoot in carbon budgets, which will be costly, and potentially impossible, to make up for. Transformative changes are necessary to achieve the rapid, extensive emissions cuts. While these changes may be disruptive, if carefully planned they can bring about many benefits across society, and will provide Ireland with learnings that would be of value globally.

The cost of inaction

Failing to cut emissions now will lead to fossil fuel lock-in, that will become increasingly difficult and costly to undo.

The status quo of fossil fuel dependence comes at a high price. **The costs of inaction far exceed the cost of the energy transition.** A rapid sustainable energy transition will bring wide-ranging benefits, including economic opportunities, improved well-being, greater equity and the environment. Further, it will avoid the need for significant compliance costs and fines resulting from failing to meet legally-binding EU targets and more costly mitigation measures required to address the overshoot of carbon budgets..

A step-change in policy development, implementation and Government investment is urgently needed.

Prepared by:

UCC Energy Policy and Modelling Group and SEAI, Ireland's National Energy Agency

How to cut fossil fuels rapidly

These 5 measures take us 90% of the way to our 2030 objective

1 Wind, solar & grid

- Renewable electricity is the backbone of the sustainable energy transition, as fossil fuels are replaced by power from wind & solar.
- Investment in the power grid – new transmission & distribution capacity, distributed energy storage, flexibility, long-duration strategic storage – is also needed.
- Both rooftop and large-scale solar farms bring benefits.
- Onshore wind capacity should double by 2030, but many barriers remain – speeding up & resourcing the planning system & grid connections is necessary.

34%

2 Electrify transport

- EV adoption must accelerate, by removing barriers and offering greater incentives.
- The higher upfront cost of EVs is generally offset by significant savings from using an EV.
- Growth in fossil fuel car sales is still greater than growth in EVs; petrol & diesel use is not falling.
- Policy options include regulating fossil fuelled car marketing, escalating motor taxes, rolling out rapid & neighbourhood public charging, zero emission city centres & incentivising used EV imports.
- EVs could store energy for a house and complement wind & solar if vehicle-to-grid & bi-directional charging technology is incentivised.

22%

3 Reduce unnecessary car use

Measures to cut car use include:

- Improve the availability, accessibility, affordability & reliability of public transport & accelerate delivery of major infrastructure.
- Ensure new housing developments are dense & have public transport access.
- Greatly expand park & ride.
- Ensure sustainable school transport options – school buses & safe routes to schools for all.
- Disincentivise urban & workplace parking – reward sustainable commuting instead.
- Reallocate road space to sustainable transport & the urban realm.
- Congestion charging.

10%

4 Retrofit, heat pumps & district heat

- High heat loss and fossil fuel dependence in buildings are linked to energy poverty, poor health, air pollution, high energy bills, low comfort, & high greenhouse gas emissions.
- Providing clean and affordable heating and retrofitting the housing stock can address these problems simultaneously. Heat pump deployment is critical.
- District heating can serve around half of buildings and be integrated with the electricity system with heat storage. Spatial heat plans and targeted policy can capitalise on this opportunity.

12%

5 Decarbonise industry

- Most emissions from the industrial sector come from burning fossil gas and oil to produce heat. Over half of these can be replaced by electricity.
- Significant energy savings can be achieved through efficiency measures, like heat recovery.
- Electricity and renewable fuels must be used to replace fossil fuels for high temperature heat.
- Sustainable bioenergy resources are constrained and may conflict with other land uses.
- Green hydrogen may be developed the 2030s, when there is a surplus of renewable energy.
- Support for industry to explore new technological options for decarbonising cement is required.

10%

A safer climate

- Decarbonisation is an imperative: National carbon budgets, EU Directives, and the Paris Agreement are all legally binding on Ireland.
- Failing to cut emissions quickly in the short-term and overshooting carbon budgets will make it more difficult to meet obligations in the long run, requiring costly and uncertain carbon removal technologies, which are unlikely to bring the same benefits for energy security, nature and wellbeing.
- Irish people are threatened by climate change: we need the world to take greater action. Even though Ireland's emissions are small in a global context, we are the second highest per-capita emitter in Europe. By meeting our own decarbonisation targets we can advocate for stronger climate action globally, helping to protect ourselves and future generations.
- As a high-emitting country with significant capacity, Ireland has a moral responsibility to act. Leadership and solidarity shown through the pandemic shows we have the capacity for acting for the greater good.



Health, wellbeing & equality

- Fossil fuel dependence causes ill health, inequity and hardship, which can be addressed through a transformation to a sustainable energy system.
- Clean energy can cut air pollution, which causes >1000 premature deaths annually, heart disease and respiratory illness, including asthma. Air pollution is mainly caused by burning coal, peat and wood in homes and diesel in cars, trucks and boilers.
- Retrofitted homes are warmer, drier, and more comfortable. Warmer homes improve wellness and health, especially for the young and the elderly.
- Walking and cycling bring many benefits for health and wellness, by increasing exercise and reducing car dependence and traffic.
- Improved active and public transport enhances social equity by improving access, lowering dependence on cars & their associated cost.
- Lower energy demand and careful planning reduces potential conflicts between renewable energy and biodiversity.



Security

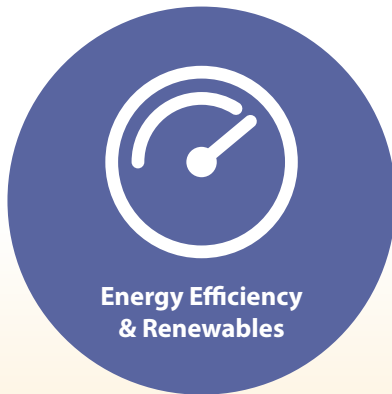
- Around 90% of Ireland's primary energy demand is imported, leaving us vulnerable to geopolitical disruption, both from oil and gas supply shocks, and price volatility.
- Ireland is one of the most fossil fuel dependent countries in Europe. This is hugely costly, and was the main reason for hardship, inflation, energy poverty and economic damage experienced through the cost-of-living crisis. Energy credits for households cost the budget €1 billion in 2024 alone.
- According to the Energy Security Review, energy security will be improved mainly through reducing dependence on fossil, by rolling out renewable energy sources and improving efficiency.
- Climate change is a profound systemic risk to national security.
- Lowering energy demand and energy waste improves energy security and resilience and reduces dependence on supply chains and critical minerals.



Financial & economic benefits

- Addressing climate change and cutting fossil fuel dependence is essential for long-term prosperity. Imported fossil fuels cost Ireland €5-8 billion annually. Fossil fuel prices are volatile, which hurts homes and businesses.
- Many energy transition measures have a high upfront cost, but reduce bills and bring financial savings in the long-term.
- A cleaner energy system reduces both private and State healthcare costs.
- Generating energy domestically is a huge economic opportunity, including for job creation. Irish industry can drive innovation, by manufacturing and providing services for a renewable and efficient energy system.
- Climate change is a major threat to prosperity and growth. Taking action to cut emissions as part of a global effort reduces this threat.
- Active travel supports local businesses, increases property values and lowers infrastructure cost.
- Ireland is at risk of being left behind the green transition, and suffering from reputational damage unless commitments are met.

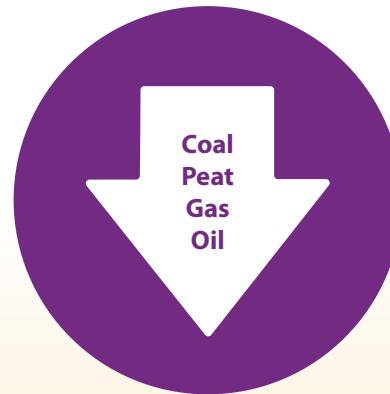




Energy Efficiency
& Renewables

Accelerate clean energy measures

Accelerating the deployment of the measures listed above can bring significant benefits for cutting cumulative GHG emissions and keeping within carbon budgets. Rather than seeking new solutions to decarbonise energy, bringing forward the adoption of these measures that are already mainstream, are scalable and bring broader benefits is essential for remaining within carbon budgets.



Cut fossil fuels

Carbon budgets constrain total fossil fuel use.

Targeting decarbonisation measures to replace the most polluting fuels - coal and peat, then oil and gas - brings greater carbon savings. While natural gas is required in the short-term, mainly for electricity, its use must fall substantially by 2030 to meet carbon budgets.



Cut energy demand

Cutting energy demand alongside rolling out clean energy technologies is critical to meet carbon budgets and the EU Energy Efficiency Directive.

Strong demand growth is currently outpacing gains from technological change, like running up a down-moving escalator. Examples include data centres, the growing size of cars, and dispersed settlement patterns, which drive greater car use and make the construction of low-carbon infrastructure, like district heating networks and public transport, less viable.

Basing Ireland's carbon budgets on temperature neutrality would undermine obligations under the Paris Agreement

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Research Fellow in Climate Change Science and Policy

Prof. Hannah Daly

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September 2025

Executive summary

Ireland has committed, through the Climate Action and Low Carbon Development (Amendment) Act 2021 and by ratifying the Paris Agreement, to pursue climate action with the *highest possible ambition*. Ireland is also bound under ambitious and binding climate targets at the EU level: a 55% reduction by 2030, a 90% reduction by 2040 (under discussion), and net-zero greenhouse gases by 2050. Together, that means doing everything feasible to reduce greenhouse gas emissions and to make a fair contribution to the Paris Agreement temperature goal limiting warming to 1.5°C.

We are now perilously close to breaking that limit. Achieving the Paris Agreement goals requires rapid and sustained emissions reductions across all greenhouse gases, including methane (CH₄), which is responsible for around 0.5°C of warming to date as a result of human activities. Given Ireland's position as among the world's highest per-capita emitters of methane, its approach to this gas in particular will set a precedent.

The Climate Change Advisory Council (the Council) has done important work and led an extensive process in preparing and proposing Ireland's second cycle of carbon budgets, an approach which has been documented in detail. However, the Council's choice to interpret 'climate neutrality' as *temperature neutrality* (or 'no additional warming') and use this as the basis for its proposed carbon budgets, carries serious risks. This interpretation allows high ongoing methane emissions to be treated as climate neutral, even though they continue to cause high ongoing warming.

Key messages

- Temperature neutrality reduces ambition and is inconsistent with Ireland's commitments under the Paris Agreement.
- It shifts greater mitigation responsibility onto other countries, or else implies abandoning the goals of the Paris Agreement.
- It entrenches inequality by 'grandfathering', rewarding high methane emitters, and penalising low emitters.
- It risks undermining the case for future carbon dioxide removals, essential to bring global temperatures down following overshoot of the Paris Agreement 1.5°C temperature limit.
- It is not compatible with the EU's approach to climate neutrality, and by adopting 'temperature neutrality', Ireland would require other EU states to do more.
- Temperature neutrality is also impractical as a policy goal for a number of reasons.

Recommendations

Adopting *temperature neutrality* as Ireland's definition of climate neutrality would weaken ambition, contradict international commitments and shift the burden of mitigation unfairly to others. To ensure that Ireland upholds the highest possible ambition, as required by law, we recommend:

1. **Reject temperature neutrality** as the basis for interpreting climate neutrality in carbon budgets.
2. **Re-evaluate the carbon budget process** to ensure alignment with Ireland's obligations under the Paris Agreement (Articles 2 and 4), including equity, responsibility, and capability principles.
3. **Adopt ambitious methane targets:** commit to at least the Global Methane Pledge level (30% reduction on 2020 levels by 2030), with the aim of deeper cuts by mid-century.
4. **Lead on food system transformation:** develop scenarios that explicitly include diversification away from ruminant-based agriculture, sustainable land use strategies, and pathways for resilient rural economies.
5. **Support for farmers:** pair ambitious methane targets with a just transition plan for the agricultural sector, including income diversification.
6. **Close the 2030 implementation gap immediately:** strengthen near-term measures to avoid making CB3 and CB4 unattainable.
7. **Explore alternative approaches:** consider split-gas frameworks or explicit dual targets for long- and short-lived gases, provided they uphold ambition and transparency.
8. **Ensure transparency in modelling:** publish assumptions and value judgments underpinning carbon budget methodologies, especially on equity and fairness.
9. **Plan for carbon removals responsibly:** adopt scenarios that realistically account for the scale, costs, and risks of carbon dioxide removals.
10. **Align fully with the EU framework:** commit to carbon budgets that are aligned with the EU's targets, and avoid approaches that would require other Member States to compensate for Ireland's emissions.

This policy brief was created through a funded research project called [SELS](#) (Sustainable integrated pathways for carbon-negative energy, land and food systems) which aims to develop a new integrated energy, land, food system modelling tool and capacity to support long-term climate planning and improve the evidence base for climate policy. The SELS project is funded through the EPA Research Programme (2021-2030), which is a Government of Ireland initiative funded by the Department of Climate, Energy and the Environment. The views expressed in this report are those of the authors and do not necessarily reflect the views of the EPA or the Irish Government.

1. Backgroundⁱ

Climate Act and the carbon budget process

The 2021 Act requires the Council to propose carbon budgets that are consistent with the *national climate objective*—achieving a climate-neutral, environmentally sustainable economy by no later than 2050. These budgets must also align with Ireland’s obligations under the Paris Agreement.

In December 2024, the Council proposed revised budgets for 2031-2035 (160 Mt CO₂ eq) and a provisional budget for 2036-2040 (120 Mt CO₂ eq)ⁱⁱ. While under consideration by the Minister for Climate, Energy and Environment, the proposed budgets have been referred to the Joint Oireachtas Committee on Climate, Environment and Energy, who is presently evaluating the proposal.

This policy briefing focuses on the Council’s decision to interpret ‘climate neutrality’—a core basis for carbon budgets—as ‘temperature neutrality’, or ‘no additional warming’.

Unclear nature of ‘climate neutrality’

The Act defines the ‘national climate objective’ and a ‘climate neutral economy’. However, there is no clear definition of ‘climate neutrality’ in law or in the scientific literatureⁱⁱⁱ. The Council has chosen to equate climate neutrality with stabilising Ireland’s contribution to global warming—temperature neutrality—rather than achieving net-zero greenhouse gas emissions. This choice has major implications for the level of ambition expected from Ireland, and the fairness and adequacy of mitigation action.

Therefore, in the development of carbon budgets, ‘climate neutrality’ needs to be interpreted in light of the multiple requirements of the Act, which includes alignment with the Paris Agreement’s Articles 2 and 4, and including common but differentiated responsibility and respective capability (CBDR-RC).

The challenge of methane

Carbon dioxide (CO₂) accumulates in the atmosphere; therefore carbon dioxide emissions must fall to at least net-zero to stabilise temperatures^{iv&v}. Methane behaves differently: it breaks down within about 12 years, but while present it is a very powerful greenhouse gas. Cutting methane can reduce global temperatures within decades. To meet global temperature goals, global methane emissions require deep cuts, of around 50% between 2020 and 2050^{vi,vii}. Stabilising methane at current levels would lock in the ~0.5°C of warming that methane emissions have already caused, which is incompatible with the temperature goals of the Paris Agreement. Immediate cuts in methane emissions can keep ‘low warming’ carbon budgets within reach and reduce the reliance on carbon dioxide removals (CDR)ⁱⁱⁱ. Yet global methane emissions have been rising rapidly since 2006, with acceleration since 2020.

Agriculture is responsible for ~40% of global anthropogenic methane emissions, mainly from ruminant livestock and rice. If reduction of methane emissions related to food production are avoided or delayed there will be significant consequences. Continuing current agricultural practices and dietary patterns could contribute to 0.7°C–0.9°C of warming by 2100 with methane being responsible for up to 60% of projected warming from business-as-usual food consumption^{viii}. High-income countries, with considerable agricultural methane emissions, could contribute to limiting peak temperatures by immediately and decisively cutting methane emissions this decade. However, if they are indecisive regarding reductions of agricultural methane emissions during that period the opportunity is lostⁱⁱⁱ.

Ireland has as an unusual greenhouse gas emissions profile: the energy sector accounts for around 57% of emissions, while agricultural accounts for 37%, dominated by methane from ruminant livestock^{ix}. As a result, Ireland's per-capita methane emissions are among the highest in the world^x. This creates a unique challenge for Ireland, because methane emissions are closely related to ruminant production, and significant cuts in methane emissions challenges an economic strategy of expansion. However, high-income countries with large agricultural emissions also have a responsibility to take the lead on reducing greenhouse gas emissions.

Ireland's international obligations: Paris Agreement, EU targets & the Global Methane Pledge

Ireland has ratified the Paris Agreement^{xi}. Article 2.1a of the Paris Agreement establishes the long-term temperature goal, which requires countries to hold warming well-below 2°C while pursuing efforts to hold it to 1.5°C. This includes peaking global temperature and bringing temperature back down after any overshoot. Article 4 establishes the global mitigation goal, which is equivalent to achieving net-zero greenhouse gases in the second half of the century.

These obligations are grounded in equity and 'common but differentiated responsibilities and respective capability' (CBDR-RC). As countries determine their contribution to the Agreement's temperature goals, high-income countries with high historical emissions (i.e. more responsibility for climate change) and developed economies (i.e. more capability for climate action) have agreed to take the lead in reducing greenhouse emissions while supporting low-income, low-emissions countries to effectively implement the Paris Agreement.

By ratifying the Paris Agreement, Ireland has committed to pursue climate action with the *highest possible ambition*^{xii}.

Ireland as a Member State of the EU is part of a Union-wide target under the EU Climate Law. The EU aims to achieve net-zero greenhouse gases by 2050. The EU has adopted an intermediate target for 2030—a 55% reduction in greenhouse emissions based on 1990—and a target for 2040—a cut of 90%—is

under discussion. This target is aligned with the Paris Agreement long-term temperature goal and global mitigation goal.

Ireland is also a signatory to the Global Methane Pledge which commits countries to rapid and deep cuts in global methane emissions, 30%, on 2020 levels, by 2030. Some scientists consider this to be the minimum level necessary to meet safe temperature targets^{xiii}.

By ratifying these agreements, Ireland has committed to strong climate action. A domestic reinterpretation of climate neutrality that lowers ambition runs counter to these obligations.

2. What is temperature neutrality?

What does temperature neutrality mean and how does it differ from net-zero?

Temperature neutrality (or ‘no additional warming’) is an approach to defining climate neutrality that aims to stabilise, as opposed to reduce or eliminate, a country’s contribution to global warming by a given year. In this framing, a country is considered ‘climate neutral’ when its ongoing emissions no longer increase the level of warming it has already caused.

For long-lived gases like carbon dioxide, temperature neutrality is reached approximately when emissions reach net-zero, because carbon dioxide accumulates in the atmosphere and continues to increase temperatures until emissions are eliminated.

For methane the situation is different. Its shorter lifetime means neutrality can be achieved in a few decades by stabilising or slightly reducing methane emissions. The source of emissions still causes warming, however—methane is a very powerful greenhouse gas. In other words, methane emissions can still be very high, and cause significant ongoing warming, yet be considered ‘temperature neutral’ if the rate of warming is not increasing. For many industries, including Ireland’s agriculture sector, this could be achieved with relatively minor measures.

In practice, this means that by setting a goal of temperature neutrality, a country or sector could keep methane emissions at approximately constant levels (while cutting long-lived gases to net-zero) and claim ‘climate neutrality’.

Moreover, when applied together to a mix of greenhouse gases, the target of temperature neutrality could be met by counting a reduction in methane emissions as a ‘cooling’ effect which offsets ongoing positive emissions of long-duration gases like carbon dioxide. With this approach, methane emissions may still be relatively high, and carbon dioxide emissions may be positive (i.e. not net-zero).

The Bathtub Analogy: carbon dioxide (CO₂) and methane (CH₄)

Imagine a bathtub with the plughole blocked. Every drop of water added (every tonne of carbon dioxide emitted) raises the water level (global temperature). To stop the level rising, you must stop pouring water in (reduce carbon dioxide emissions to zero) or remove as much water as you add (reach net-zero carbon dioxide). Even if you slow the flow, the water level keeps climbing, because the total rise depends on the cumulative volume (total amount) of water poured in.

When you add bubble bath the foam (warming from methane emissions) rises quickly at first but then starts to disappear (methane is a potent greenhouse gas, but short lived in the atmosphere). If you keep adding bubble bath at the same rate the foam layer will stay at the same height (no extra/additional warming from methane). If you add more bubble bath over time, the foam gets taller (extra/additional warming from methane). If you add less bubble bath over time the foam gets shorter (you start to reverse the previous heating from methane). Stop adding bubble bath and the foam will eventually disappear.

Today, water and bubble bath are pouring into the bath faster than ever. The current height of water plus foam means the bath is dangerously close to overflowing. This represents the ~1.5°C of warming already caused by past carbon dioxide and methane emissions.

Turning off the CO₂ tap will take time, and we are not confident that we can remove water from the bath later (through large-scale carbon dioxide removal (CDR)). Meanwhile, methane contributes about 30% of the total height (around 0.5°C of warming). If foam from the bubble bath stays the same height (aiming for 'temperature neutrality' of methane) the level of water and foam in the bath remains too high. Only by turning off the water (carbon dioxide) and the reducing by at least half the amount of bubble bath (methane) that is added can we bring the level of water and foam in the bath to a level where the bath is safe from overflowing. This is why cutting methane is seen as the fastest way to reduce near-term warming in the next decade or two.

3. Key problems with temperature neutrality

Inadequate under the Paris Agreement

The interpretation of ‘climate neutrality’ used by the Council^{xiv} considers the stabilisation of a country’s contribution to global warming, that is ‘temperature neutrality’ or ‘no additional warming’, as offering a physical sciences basis for aligning Ireland’s climate targets with Article 2 of the Paris Agreement. This interpretation, however, is inadequate. The Paris Agreement’s long-term temperature goal establishes temperature limits, and requires global mean temperatures not only to stabilise, but to peak and then decline to 1.5°C following any overshoot^{xv} of the Paris Agreement temperature goal.

A strategy of temperature neutrality would only stabilise Ireland’s contribution to global warming. If every country were to adopt this approach, it would not deliver the peak-and-decline pathway needed, and the 1.5°C goal would be lost.

Findings from Duffy et al 2025ⁱⁱⁱ, show that the approach proposed by the Council only briefly achieves temperature neutrality.

Crucially, the temperature neutrality approach allows dramatically higher levels of emissions compared with other approaches, such as the net-zero greenhouse gas approach used by the EU, while claiming climate neutrality. This artificially lowers ambition and reduces the level of effort required, and also risks underestimating the amount of carbon dioxide removals that Ireland will have to deliver.

At the global level, adopting temperature neutrality for methane could imply stabilising methane emissions. While this does not add to warming, it would maintain the ~0.5°C of warming methane has already caused. Reducing methane and reversing some of this warming is essential if we are to limit the extent of overshoot and return below the 1.5°C temperature limit. If Ireland were to stabilise methane at current levels, other countries would have to do more to compensate or accept that the Paris Agreement temperature goals will be permanently breached.

Inadequate under the EU and Global Methane Pledge

The proposed interpretation of ‘climate neutrality’ would also create a divergence with the EU’s approach, under which Ireland is bound as a Member State. The EU definition of climate neutrality is clear: net-zero greenhouse gases by 2050, not temperature neutrality. If Ireland were to change the domestic target to allow for high and ongoing (but stable) methane emissions, other Member States would be required to go deeper into net-negative emissions, relying on carbon dioxide removals, to make up the shortfall at an EU level. This outcome is unlikely to be accepted^{xvi}.

Ireland is already projected to miss its 2030 Effort Sharing Regulation (ESR) target by the widest margin in the EU on a per-capita basis, exposing it to potential compliance costs estimated at up to €26 billion^{xvii}. Methane accounts for 37% of Ireland's emissions under the ESR, significantly greater than the EU average.

Methane reductions in the scenarios^{xviii} underpinning the Council's proposed carbon budgets are not aligned with the level of ambition in the Global Methane Pledge (a 30% reduction, on 2020 levels, by 2030). This would require other signatories to achieve deeper reductions to compensate, or for the pledge be abandoned.

Fairness

Temperature neutrality—stabilising the a country's warming impact by 2050—is not only scientifically insufficient, it is also inherently unfair. It implicitly embeds a principle of 'grandfathering'^{xix}. Grandfathering means that the emissions that have been produced by a country in the past determine that country's entitlement to emissions in the future.

Applied to methane, the temperature neutrality approach measures the impact of a *change* in emissions, rather than the absolute level of warming caused by emissions. This diverges from the standard and globally-accepted method of measuring the warming impact of a greenhouse gas, which measures the absolute warming caused, rather than warming relative to past emissions. This new proposed approach particularly favours countries with historically high methane emissions by allowing them to continue emitting at elevated levels while claiming to be climate neutral. Conversely, low-emitting countries that increase methane emissions modestly, perhaps to meet basic development or food security needs, are penalised disproportionately.

For Ireland, this creates a serious risk of adopting a metric that entrenches inequality. Because its per-capita methane emissions are already among the highest in the world, a stabilisation pathway under temperature neutrality locks in a very large "warming entitlement". This directly contradicts a key principle of the Paris Agreement – that high-income, high-emissions countries should take the lead in cutting emissions.

Adopting temperature neutrality also risks perverse accounting outcomes: some high-emitting countries or sectors could even appear to have 'negative' methane emissions when reducing from a high baseline, generating credits that could offset their carbon dioxide emissions. This would allow developed countries to claim additional room for fossil fuel emissions, while developing countries are penalised for growth, worsening global inequality.

The Council's analysis compounds this problem by choosing 2021 as the base year for assessing temperature neutrality, disregarding warming contributions prior to this, including of carbon dioxide. This has been described as an 'indefensibly late' base year, according to advice commissioned by the Council^{xx&xxi}.

This is not a neutral scientific exercise. The modelling methodology used to develop the Council's proposed carbon budgets, establishing temperature neutrality, masks significant implicit value judgements related to these questions of justice and fairness. These judgements have not been analysed in relation to legal obligations that carbon budgets are aligned with the Paris Agreement, which requires equity, responsibility and capability considerations. The Council acknowledges that if the global population emit at the same rate as Ireland, current global warming would exceed 3.6°C. This comparison illustrates both the inequity and potential risk to the Paris Agreement long-term temperature limit.

Risks for policy development

The Council's temperature neutrality scenario, analysed in Duffy et al (2025), achieves temperature neutrality but does not account for the small cumulative warming from residual methane emissions and declining background methane emissions. This approach is often justified as mirroring the climate outcome of net-zero greenhouse gases for short-live climate forces like methane. However, this equivalence only holds if both cumulative impacts and the global background emissions context are fully accounted for. This highlights two major shortcomings of the target: (1) sensitivity to global emissions trends and modelling assumptions, including the mistaken idea that constant methane emissions equate to temperature neutrality, which makes for a moving target and (2) a risk of over-reliance on (anticipated) methane reduction in the short-term, which may lead to underestimation of the long-term need for carbon dioxide removals in the longer-term. These shortcomings could misdirect climate policy, and delay the urgent action needed to steer Agriculture Forestry and Other Land Use towards a sustainable 'solution space'.

The international credibility of this approach is also questionable. In Aotearoa New Zealand, the government's adoption of a 'no additional warming' target for methane has drawn sharp criticism from scientists^{xxii}, saying the approach 'redefines the goal of climate action as simply stabilising the warming impact of emissions from any give source at current levels—rather than seeking to 'minimise all greenhouse gas emissions' and their contribution to warming.' They also warn that such a move could jeopardise Aotearoa New Zealand's commitments under the Paris Agreement and are inconsistent with equity, responsibility and capability commitments under Article 4 of the Paris Agreement. If Ireland

follows this path, it risks being grouped with a small number of outliers, undermining its reputation both within the EU and internationally.

Undermining global food security

Using a temperature neutrality approach allows Ireland to maintain high per-capita methane emissions, while disproportionately penalising countries for growing their methane emissions, even from a low baselineⁱⁱⁱ. This approach denies emissions space to low-emitting countries that may need to expand their agricultural sectors to address food insecurity. In effect, it locks in an inequitable distribution of warming responsibility, entrenching privilege for high-income exporters like Ireland.

4. Recommendations

Adopting *temperature neutrality* as Ireland's definition of climate neutrality would weaken ambition, contradict international commitments and shift the burden of mitigation unfairly to others. To ensure that Ireland upholds the highest possible ambition, as required by law, we recommend:

1. **Reject temperature neutrality** as the basis for interpreting climate neutrality in carbon budgets.
2. **Re-evaluate the carbon budget process** to ensure alignment with Ireland's obligations under the Paris Agreement (Articles 2 and 4), including equity, responsibility, and capability principles.
3. **Adopt ambitious methane targets**: commit to at least the Global Methane Pledge level (30% reduction, on 2020 levels, by 2030), with the aim of deeper cuts by mid-century.
4. **Lead on food system transformation**: develop scenarios that explicitly include diversification away from ruminant-based agriculture, sustainable land use strategies, and pathways for resilient rural economies.
5. **Support for farmers**: pair ambitious methane targets with a just transition plan for the agricultural sector, including income diversification, land restoration, and investment in innovation.
6. **Close the 2030 implementation gap immediately**: strengthen near-term measures to avoid making CB3 and CB4 unattainable.
7. **Explore alternative approaches**: consider split-gas frameworks or explicit dual targets for long- and short-lived gases, provided they uphold ambition and transparency.
8. **Ensure transparency in modelling**: publish assumptions and value judgments underpinning carbon budget methodologies, especially on equity and fairness.

9. **Plan for carbon removals responsibly:** adopt scenarios that realistically account for the scale, costs, and risks of carbon dioxide removals.
10. **Align fully with the EU framework:** commit to carbon budgets that are aligned with the EU's targets, and avoid approaches that would require other Member States to compensate for Ireland's emissions.

Endnotes

- ⁱ Many of the arguments below have been presented alongside supporting evidence and references in a peer-review academic journal, Environmental Research Letters, in a paper titled *National temperature neutrality, agricultural methane and climate policy: reinforcing inequality in the global food system*, Duffy et. al (2025) (<https://doi.org/10.1088/1748-9326/adf12d>). Dr Róisín Moriarty and Professor Hannah Daly are co-authors of this academic paper.
- ⁱⁱ CCAC 2024 <https://www.climatecouncil.ie/carbonbudgets/carbonbudgetproposal2031-2040/>
- ⁱⁱⁱ Duffy et al 2025 <https://doi.org/10.1088/1748-9326/adf12d>
- ^{iv} IPCC Synthesis Report Summary for Policymakers
https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf
- ^v IPCC 2021 AR6 WGI Summary for Policymakers
https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf
- ^{vi} In global scenarios assessed by the IPCC for AR6, global methane emissions fall by 47-60% between 2020 and 2050 in pathways compatible with 1.5°C
- ^{vii} Rogelj & Lamboll 2024 <https://www.nature.com/articles/s43247-023-01168-8>
- ^{viii} Ivanovich et al 2023 <https://www.nature.com/articles/s41558-023-01605-8>
- ^{ix} EPA 2024 https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/Ireland's-NIR-2024_cov.pdf
- ^x Rogelj & Schleussner 2019 <https://dx.doi.org/10.1088/1748-9326/ab4928>
- ^{xi} List of countries that have ratified the UNFCCC Paris Agreement
https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-7-d&chapter=27&clang=en
- ^{xii} Schönfeld & Rogelj preprint https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5027491
- ^{xiii} Ocko et al 2021 <https://iopscience.iop.org/article/10.1088/1748-9326/abf9c8>
- ^{xiv} Wheatley 2023 <https://www.tandfonline.com/doi/full/10.1080/14693062.2023.2191921>
- ^{xv} Rogelj, Geden, Cowie & Reisinger 2021 <https://www.nature.com/articles/d41586-021-00662-3>
- ^{xvi} Geden 2024 <https://www.climatecouncil.ie/media/CBWG%20Report%20Carbon%20Dioxide%20Removal.pdf>
- ^{xvii} Irish Fiscal Advisory Council & Climate Change Advisory Council 2024 <https://www.fiscalcouncil.ie/wp-content/uploads/2025/03/Irelands-climate-action-and-the-potential-costs-of-missing-targets.pdf>
- ^{xviii} Lanigan, Hanrahan, Donnellan & Richards 2024
<https://www.climatecouncil.ie/media/CBWG%20Report%20FAPRI%20Model.pdf>
- ^{xix} Rogelj & Schleussner 2019 <https://iopscience.iop.org/article/10.1088/1748-9326/ab4928>
- ^{xx} Mintz Woo, 2024
<https://www.climatecouncil.ie/media/CBWG%20Report%20Some%20Moral%20Considerations.pdf>
- ^{xxi} McMullin, Sweeney & Price 2025 <https://www.postcarbonireland.org/etc/2025/CB-Cy2-Consultation.pdf>
- ^{xxii} Open Letter to Prime Minister Luxon regarding the government's review of New Zealand's biogenic methane target <https://biogenicmethane.org/>