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For *a fossil free future for Ireland*

Consultation on the development of Ireland's Social Climate Plan

This submission is made on behalf of Not Here Not Anywhere (NHNA), a nationwide, grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland.

NHNA welcomes DCEE's acknowledgement that:

> *The increase in price of fossil fuels due to the introduction of ETS II is likely to have a disproportionate negative impact on vulnerable households, vulnerable microenterprises and vulnerable transport users.*

However, NHNA notes that according to the recent Comptroller and Auditor General report, the State itself is vulnerable:

> *Current projections by the EPA indicate that, even with the implementation of planned additional measures, emissions are expected to exceed the national target in 2030. …If Ireland fails to meet its national emissions reduction targets, the consequences will be significant, affecting the State legally, financially, economically, environmentally, and politically (Comptroller and Auditor General, 2025, p. 210).*

Ireland's energy market is not only failing to meet emissions targets, but is also exacerbating energy poverty as highlighted by the recent report issued by the International Energy Agency:

> *EU countries have some of the highest residential electricity prices in the world, but the range is wide. Prices are highest in Ireland and Germany (Bahar, 2025, p. 123).*
>
> *The disparity [between wholesale electricity prices and the energy component of retail rates] in Ireland was the largest [in the EU], with…prices three times higher than wholesale prices (Bahar, 2025, p. 130).*

A new approach is urgently needed. NHNA recommends adopting an energy democracy model.

Energy Democracy

Energy democracy means that energy is produced by the people, for the people. Renewable energy is produced and controlled at local level by communities and the state, not for-profit private companies. Energy democracy gives rise to green, local employment and allows small and medium-sized social enterprises to develop. This means that energy is cheaper, more accessible, and energy demand is managed more efficiently (Anna_Media, 2021).

Ireland has a long history of treating energy as a public good: ESB was established in 1927 to ensure not-for-profit, universal, and affordable access to electricity. This included renewable power; the Ardnacrusha hydroelectric power plant was developed in 1929 (Doyle, 2012). We, as members of the public, have had control over our energy system before, and should have it again.

NHNA has identified seven core principles of energy democracy:

1. **Fossil Free & Renewable Energy**

We must urgently and rapidly phase fossil fuels out of the energy mix in Ireland. This principle intersects all points of our energy democracy model. To meet our national carbon budgets under the Climate Action Plan (DCEE, 2023), gas demand in Ireland must fall 40% by 2030 and a further 80% by 2040 (Daly, 2022). New investment in fossil fuel exploration or infrastructure, such as LNG import terminals, would only delay the energy transition (eeb.org, 2020). Fossil fuels also have unacceptable human rights and safety impacts on communities at home and abroad (Surapaneni, 2019). Finally, renewable energy with storage is cleaner and cheaper than fossil fuels for decarbonisation (Shearer et al., 2014).

2. **Public and Community Ownership**

We must reimagine and rebalance energy ownership, transitioning away from the current developer-led for-profit approach. Energy democracy includes both state and community ownership. Ireland is very suitable for state ownership of renewable energy resources, with a state-owned grid and major semi-state organisations such as ESB (Oireachtas.ie, 2021) and Bord na Móna (peatlandsandpeople.ie, n.d.). Appropriate governance structures should be put in place to ensure these organisations are

accountable to the public. Community energy consists of community-based projects, organisations and social enterprises involved in the energy sector, owned and operated by local people and local authorities in the community (European Commission, n.d.). Denmark and Germany, where wind and solar energy were scaled up rapidly, have the highest levels of local and community ownership in Europe (Loebbe, Sioshansi and Robinson, 2022; State of Green, n.d.; ENERGY ATLAS, n.d.). Local energy also strengthens local economies (ENERGY ATLAS, n.d.). By avoiding large financial outflows from local economies to pay for external fuel and external energy, more financial resources are retained and circulated in local economies.

3. Eliminate Energy Poverty

Energy systems should be set up in a manner that addresses energy poverty and is inclusive of marginalised groups. In November 2022, an ESRI conference revealed that 40% of Irish households were experiencing energy poverty (Brennan, 2022). As acknowledged by DCEE, marginalised groups are disproportionately vulnerable to energy poverty. Measures should be put in place to ensure costs are kept to a fair level, for example housing stock retrofitted rapidly. Energy has to be seen as a human right and should not be subject to price hikes for company profits. A sovereign wealth fund or "Windy Day" fund should be established whereby the revenue from state-owned renewables are invested on behalf of the Irish people (OECD, 2025).

4. Just Transition

In trying to increase equality and eliminate energy poverty, we have to make sure we do not create other inequalities through the transition. People currently working in the fossil fuel industry should be offered training opportunities and financial support if they become unemployed. New jobs created as part of the energy transition have to include fair pay, protection of workers and access to unions to protect the interests of the people enabling energy democracy on the ground (United Nations, 2021). We also need to consider spatial justice (Banerjee and Schuitema, 2023). Community and public ownership with public participation and accountability means that energy projects are built all over the country rather than in select areas. However, communities building and investing in local projects also carries the risk of resource-rich areas having better access to energy. Thus, we need balance in planning and targeted support and empowerment for communities with fewer resources.

5. Reduce Energy Demand

Energy demand should be managed responsibly and sustainably, with energy seen as a public good whereby essential services are prioritised (energyeducation.ca, n.d.). This should particularly target large energy users, who are often private corporations (such as data centres) who provide no transparency (Veritas.com, 2020) about the need for their energy demand, beyond profit maximisation. Energy reduction should happen equitably, without disadvantaging vulnerable members of society. Economic models should be adopted which ensure quality of life and equity for our societies, and also reduce demand and consumption in certain sectors.

6. Public Participation in Energy Planning

Public participation has to be ensured at all levels and stages of the energy transition. Local government should work closely with local communities to improve education and access to information around energy issues. They should also proactively engage in consultations and participatory processes which empower local people and build their capacity to have a say in the energy transition in their area. A participatory process can include, for example, annual local climate dialogues, information sessions and consultations on impact assessments (Nabatchi, 2012). Citizen participation would also encompass the design of the participatory process itself. Special outreach efforts must be made to include disadvantaged or marginalised groups in these processes and consultations.

7. Energy Security

Energy democracy means local communities, and Ireland as a whole, are self-sufficient in terms of energy by producing it from renewable sources at home. This protects us from global supply disruptions and price changes, both of which are associated with importing fossil fuels (Ieefa.org, 2022). Renewables are often affected by weather, so investing in localised and large-scale energy storage (e.g., batteries, green hydrogen, pumped hydro) (National Grid, 2023), as well as interconnector cables to our European neighbours can ensure energy security with renewables.

Energy Democracy Examples

Numerous community renewable energy exemplar projects exist around Europe, such as the Edinburgh Community Solar Co-operative (Edinburghsolar.coop, 2014), the Som Energia non-profit renewable energy cooperatives in Spain (Som Energia, 2025), and

Amsterdam's community energy cooperatives – Ecostroom and Zuiderlicht – who work to turn empty roofs of the city (including many commercial roofs) into a community-solar powerhouse (Patagonia Films, 2022). See http://rescoop.eu which is an umbrella body for community energy cooperatives in Europe.

Comment on the survey

NHNA has chosen not to complete the consultation survey. Dividing society between urban and rural communities, households, enterprises and transport users, presents false di/trichotomies. Several of the measures presented were listed in the government's Climate Action Plan 2025, which included delayed actions from 2023 and 2024 (gov.ie, 2025). The government has been failing to act at the scale required for years. It is time to return control over the energy system to the State and to communities around Ireland.

Regards,

Amy Dunnigan

On behalf of
Not Here Not Anywhere

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