

# Submission to Galway County Council Climate Action Plan – from *Not Here Not Anywhere*



*Not Here Not Anywhere* is a nationwide, grassroots, volunteer group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland. We advocate for a just transition to publicly-owned renewable energy systems and a society-wide reduction in energy demand both here and around the world. We are a non-partisan group and are not affiliated with any political party.

In 2019, Ireland was the second country to declare a climate and biodiversity emergency. To avoid the most severe impacts of climate change, global temperatures must be kept below 1.5C above pre-industrialised levels, and we will need rapid and deep action to decarbonise our energy systems. Globally, the burning of fossil fuels is the single biggest cause of climate change, and taking climate action means developing fossil-fuel-free communities in every county in Ireland. Therefore, the Climate Action Plan must enable communities to transition away from fossil fuels to renewable energy, demand reduction and demand management. This encompasses processes for carbon-proofing major decisions, programmes and projects, including investments in transport and energy infrastructure.

We applaud actions proposed in the Draft Galway Climate Action Plan in order to achieve the vital target of reducing greenhouse gas emissions by 51% by 2030. Below are some of the actions we particularly welcome:

- GL 3.2 Support the development, implementation and sharing of best practice in relation to Green Public Procurement. Develop a Sustainable Wood Procurement Strategy and overall Green Public Procurement Strategy through the Cities4Forests Programme. Develop a monitoring and reporting tool to ensure GPP is embedded into all procurement.
- GL 3.4 Commit that new public housing and buildings incorporate the principles of climate action in terms of design, services and amenities with careful consideration in the choice of materials, roof types (i.e. green roofs), water conservation, taking advantage of solar gain/passive housing, the provision of low-carbon and renewable energy technologies and public transport infrastructure such as bus stops and shelters as appropriate to the scale of the development.
- GL 4.1 Establish a network of stakeholders and ensure ongoing communication. Cultivate and actively participate in partnerships with regional local authorities and public bodies, enterprise, community, voluntary sectors, third level institutions and the research community. Maximise on potential funding streams for the county and work in partnership to develop and implement Climate Action projects and initiatives. Continue to support existing projects including LEAP, CONNECTED, Cities4Forests etc.
- TR 1. 3 Identify opportunities for reallocation of existing road space to promote active travel and improve public space and implement related projects.

- TR 1. 4 Work with communities to identify potential active travel, greenway and public transport projects and support modal shift.
- TR 1.11 Engage with public transport providers to support enhanced public transport outcomes including rural bus and train service expansion and service interconnectivity. Support public transport providers to estimate emission reductions resulting from increased public services.
- CP 1. 8 Encourage and support low carbon events including external events requiring permissions of GCC. Develop guidelines for events and a checklist to be incorporated into event licensing.
- LN 1.1 Support farmers in the shift toward low-carbon and climate-resilient agricultural practices. Work with relevant agencies to develop and implement a joined-up awareness/knowledge transfer strategy for the agricultural and food sectors. Develop a tool kit and training programme
- AD 1.6 Promote and encourage community involvement in the retrofit of SuDS in existing developments, maintaining community rain gardens, discourage hard paving in gardens and retrofit raingardens / water butt installations.

In addition, we make the following recommendations regarding your new climate action plan.

## 1. Fossil fuels and fossil fuel infrastructure

### Recommendations for additional actions:

- The Climate Action Plan should ensure a rapid phasing out of all fossil fuels including gas.
- The Climate Action Plan should include a planned phasing out of existing connections to the gas grid.
- The Climate Action Plan should ban fracked gas in its energy mix.
- The Climate Action Plan should rule out any new fossil fuel infrastructure projects.
- The County Council should pass a motion calling on the Irish Government to join the bloc of nation-states seeking to negotiate the [Fossil Fuel Non-Proliferation Treaty](#) - a new international treaty to complement the Paris Agreement and address the root cause of the climate crisis: fossil fuel.

### Impacts of Fossil Gas Projects

Research states that if we are to keep global temperature rise below 1.5°C and avoid catastrophic climate change, fossil gas must be phased out of the energy mix in Europe by 2035 (Anderson & Broderick, 2017), discrediting claims that gas is a "transition fuel" in the transition to a decarbonised economy (Borunda, 2021; Hmiel et al., 2020). Research also states that we can't develop any new fossil fuel infrastructure from 2019 onwards if we are to have a 64% chance of limiting temperature rise to less than 1.5°C (Smith et al., 2019). Any new large-scale fossil fuel infrastructure must be ruled out, as they will lock us into additional use of fossil fuels. Further investment in fossil infrastructure will close the window on meeting our obligations under the Paris Agreement and the county's and Ireland's legally binding targets, rather than getting us closer.

The Draft Climate Action Plan should detail the explicit commitment not to construct liquefied natural gas (LNG) infrastructure in Galway. LNG has no climate benefit over coal or oil, whether from conventional or fracked sources (Howarth, 2015:49). Methane, the primary component of natural gas, is a potent greenhouse gas (GHG) with 86 times more Global Warming Potential (GWP) than CO<sub>2</sub> over a 20 year period (Myhre et al, 2013:714, Table 8.7). Gas, and particularly LNG, emits high levels of methane at all stages of the supply chain (Alvarez et al, 2018). Methane leakage and the additional energy required to process LNG specifically make it 20% more GHG emissions-intensive than short-distance gas (Anderson and Broderick, 2017). This highlights that even if fossil gas was needed for energy security, LNG would be inferior to short-distance gas.

Additionally, LNG often includes fracked gas. A ban on hydraulic fracturing (aka “fracking”) in Ireland was signed into law in 2017. Having seen fit to ban it here, we should not be complicit in fracking in other countries by importing fracked gas. It would also be impossible to confirm that the imported LNG is from non-fracked sources, contravening government policy.

### Energy Security and Fossil gas

New fossil fuel infrastructure is sometimes justified with references to the need to increase Ireland’s energy security. For example, operators of data centres have been applying for planning permission for diesel and gas generators, sometimes entire gas power plants (MacNamee, 2023a). Notably, the energy security risks associated with continuing climate breakdown, through fossil gas emissions, are often not considered in such discussions.

New gas infrastructure is not required for energy security. A 2020 study by leading independent consultancy, Artelys (2020) concluded that “existing EU gas infrastructure is sufficiently capable of meeting a variety of future gas demand scenarios in the EU28, even in the event of extreme supply disruption cases”. The European body of gas network operators, ENTSO-G, in its 2017 Security of Supply Review, found that Ireland and the UK would suffer no curtailment in gas supply if faced with a variety of supply disruption scenarios. Historically, the UK has provided most of Ireland’s gas supply, and Ervia states that in the UK “there is ample import capacity over and above demand” (Ervia, 2018). Demand for gas in the UK has decreased by a fifth since 2004 and gas-fired electricity generation is expected to drop by 40% by 2025 (Evans, 2019). This is due to the existing over-capacity of the EU gas grid; gas import infrastructures have import capacity 200% higher than what Europe actually imports (Gaventa et al., 2016).

As outlined in the Draft Climate Action Plan, we are legally bound to emissions-reduction targets under the Climate Act, 2021, which is fundamentally incompatible with increasing investment in new fossil fuel infrastructure. Therefore, the best energy security remains a rapid transition to indigenous renewable energy and a society-wide reduction in energy demand.

### Apply pressure for an International Treaty to stop Fossil Fuels

The Paris Agreement fails to mention fossil fuels and the COP27 outcome didn’t mention oil and gas. These are glaring, consequential omissions that must be addressed. The Irish Government should join the growing bloc of nation states seeking to negotiate an international [Fossil Fuel](#)

[Non-Proliferation Treaty](#) that will manage the fossil fuel phase out in a way that is fast, fair and financed.

Local Authorities should pressure the Irish Government to do this. Local Authorities including Dunleary Rathdown and South Dublin have already done this through a motion worded “Galway County Council formally backs the call for a Fossil Fuel Non-Proliferation Treaty, and urges the Irish Government to support the initiative for a Fossil Fuel Non-Proliferation Treaty. If passed, a letter should be sent to all local Councils, An Taoiseach, An Tánaiste and the Minister for the Environment.”

Galway County Council should follow suit and pass this motion. Having a Fossil Fuel Non-Proliferation Treaty in place could radically help Governments, including local governments like Galway County Council to achieve their climate action targets.

## 2. Energy - A better way forward

### Recommendations for additional actions:

- The Climate Action Plan should include actions which incentivise community energy projects - community-based projects, organisations and social enterprises involved in the energy sector, owned and operated by local people and local authorities in the community
- The Climate Action Plan should prioritise safeguarding against Energy Poverty
- The Climate Action Plan should contain measures to ensure that energy demand is managed responsibly and sustainably, with energy seen as a [public good](#) whereby essential services are prioritised. This should involve rapid retrofitting and the decarbonisation and increase of accessibility of public transport.
- When introducing community energy projects or new energy infrastructure, decision processes should be designed in a participatory way, with input from residents and stakeholder group representatives. Special outreach efforts must be made to include disadvantaged or marginalised groups in participatory processes. Those running participatory processes should keep a detailed record of the participation of marginalised groups and of best practices that serve to increase this participation.

### Public and Community Ownership of Energy

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](#) and [Bord na Móna](#). 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. The Climate Action plan should add actions which facilitate local communities and organisations to invest in their own renewable energy infrastructure, through providing expertise and financial incentives or support. [Denmark and Germany](#), where [wind and solar energy were scaled up rapidly](#), have the [highest levels of local and community ownership in Europe](#). Local energy also [strengthens local economies](#). 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.

### 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. Marginalised groups are [disproportionately vulnerable](#) to energy poverty. The Climate Action Plan should include measures to ensure costs are kept to a fair level. For example, housing stock should be retrofitted rapidly. Energy has to be seen as a human right and should not be subject to price hikes for company profits.

### Reduce Energy Demand

Energy demand should be managed responsibly and sustainably, with energy seen as a [public good](#) whereby essential services are prioritised. This should particularly target large energy users, who are often private corporations (such as [data centres](#)) that provide [no transparency](#) 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.

The Climate Action Plan should also include an accelerated program of retrofits and solar PV for all households and community buildings, on a government-run “install now, pay as you go” basis, so that having cash up-front is not a barrier. Electrification of and improvement to frequency and accessibility of public transport (rail and buses), promotion of active travel, promotion of car sharing, and reduction in use of private cars particularly with single occupancy.

### Public Participation

Throughout the lifetime of this Climate Action Plan, Ireland’s transition to a low-carbon society is entering its most crucial decade. It’s vital that it should be centred around providing people and communities with clean, affordable and reliable energy. The best way to do so is to ensure citizen participation at all levels and stages of the energy transition.

There are many different ways in which people can participate in governance, ranging from informing to consultation to partnership to citizen control, whereby community members control the process (Armstein, 1969). While all of these methods of participation are useful and valid at different stages of policymaking, different forms of participation should be incorporated into major decisions (such as energy infrastructure projects) to create a thoroughly participative process; for example, informing and consulting at the stage of technical impact assessments. Ideally, there should be citizen participation in the design of the participatory process itself, for example through focus groups or workshops which feed directly into sub-national and national policymaking.

Community participation and ownership have proved important for public acceptance of the energy transition in countries where the transition is more advanced than in Ireland.

### 3. Data Centres

#### Recommendations for additional actions:

- The Climate Action Plan should add as an action the setting of an **overall cap** on the level of data centre energy demand that can be accommodated by the electricity grid in the county.
- The Climate Action Plan should specify that any new or existing data centres are required to provide **flexibility** to the grid at times of day and times of year when wind and solar energy on the grid is low relative to demand - and *not* allowing data centres to use **fossil fuel generation** as the means of providing this flexibility (they can use other means e.g. energy storage, time-shifting of data processing services).
- The Climate Action Plan should specify that new data centres are required to be powered entirely by one of the following, and existing centres should be required to transition rapidly to:
  - o On-site **direct renewable power** source generation combined with energy storage, or
  - o Off-site renewable power source and energy storage with dedicated grid connection (avoiding Renewable Energy Certificates).
  - o Any renewable energy infrastructure must comply with best practice public participation.
- New data centres should have infrastructure in place to enable **heat** generated from them to be utilised for district heating systems.

The government has acknowledged that “data centres pose considerable challenges to the future planning and operation of Ireland’s power system” (Department of Business, Enterprise and Innovation, 2018). As of 2022, data centres accounted for 18% of Ireland’s electricity demand, the same amount as all urban homes (CSO, 2023). Going forward, Eirgrid estimates that data centres could account for up to 27% of Ireland’s electricity demand by 2028, and up to 50% of new electricity demand growth (Eirgrid, 2020). The Irish Academy of Engineering predicts that data centre development will add at least 1.5 million tonnes to Ireland’s carbon emissions by 2030, a 13% increase on current electricity sector emissions, and will require an investment in energy generation and storage of €9 billion by 2027 (Irish Academy of Engineering, 2019).

For example, if Amazon’s eight-centre project in Mulhuddart, Dublin 15, is realised, by 2026 it would use c. 4.4% of the State’s entire energy capacity, the equivalent of Galway city, but employ only 30 people post-construction, largely in facility maintenance (Lillington, 2018). The Apple data centre proposed for Athenry, Co. Galway, would have ultimately used “over 8% of the national capacity..., more than the daily entire usage of Dublin, and “would require 144 large diesel generators as back-up” (Climate Home News, 2017).

Therefore, in a recent policy statement, the Irish government admitted that “In the short term, there is only limited capacity for further data centre development” (Department of Enterprise, Trade and Employment, 2022). These challenges include higher electricity costs for consumers (Taylor, 2018). In 2019, the Danish Council on Climate Change recommended that the Danish government legally require data centre owners and developers to contribute to the infrastructure required to supply the

centres with renewable energy, such as wind and solar farms (Irish Examiner, 2019). Polling has shown that the majority of Irish people (59%) believe that data centres should be restricted to achieve climate targets and to reduce strain on the grid (Business Post & REDC, 2021).

Currently, data centres use onsite fossil fuels generators to supply electricity at times of high electricity demand from the grid, during maintenance, or when renewable energy cannot provide enough electricity due to its inherent variability. Irish data centres now already have enough on-site power to meet all of Ireland's energy demand, indicating the scale of their additional energy consumption (MacNamee, 2023b). However, sufficient provision of electricity should not be guaranteed by relying on fossil fuels which further exacerbate climate change and again put the meeting of emissions reduction targets specified in the Draft Climate Action Plan at risk. Instead, the applicant should be required to install renewable and clean energy backup and storage, for example with battery storage sufficient for any backup and emergency power generation requirements.

Thus, the Climate Action Plan should specify a cap on the operation of (new and existing) data centres based on its emissions targets and their emissions, and require new and existing data centres to be run on renewable energy

Currently, many companies claim to operate data centres powered by 100% renewable energy. However, the energy is largely sourced indirectly through Renewable Energy Certificates or Purchase Power Agreements (Chernicoff, 2016), which means that the energy is sourced from the grid, which in Ireland is 69% fossil fuel-powered (Sustainable Energy Authority of Ireland, 2019). If we continue to allow companies to virtually purchase clean energy where it is cheapest to create, while actually using and increasing demand for dirty energy in Ireland, we allow them to profit while our real emissions continue to rise. It is crucial therefore that data centres are powered directly by onsite renewable energy generation such as rooftop solar farms or genuinely new offsite generation such as offshore wind or solar farms.

### Data Centres and Energy Security

It should be emphasised that the risks posed to Ireland's energy security, as outlined in Eirgrid's All-Island Generation Capacity Statement, are largely a result of an enterprise strategy that allows for unsustainable data centre demand growth. If the county council permits data centres and facilitates this growth in electricity demand by data centres, this will prevent the council meeting its emissions reductions targets in the Climate Action Plan. Furthermore, it is crucial that every City and County Council takes into consideration the cumulative impact of data centres' energy demand on a nationwide basis, as opposed to examining impact solely on a case-by-case basis.

### Data Centres and Transparency

Data centres provide a wide range of services, but are not transparent about the amount of energy used for these different purposes. While some capacity provides essential services to society (enabling public services like health, public transport, remote working, and communications between people), at the other end of the spectrum are services that can be seen as highly wasteful, such as cryptocurrency mining. An independent report into organisational data management also demonstrated that a majority of data stored globally is dark or redundant data, while only 14% was business-critical (Veritas, 2015), meaning that energy used for its storage is essentially wasted.

To make a case for the construction of the data centre, which will create further electricity demand and therefore challenge the realisation of Ireland's decarbonisation targets, the Climate Action Plan should require that data centre applicants provide information about the purpose of their services, and how they will ensure electricity is not wasted on storing dark or redundant data that have huge costs to our energy infrastructure without providing societal or commercial benefits.

## Waste Heat

Data Centres also generate large quantities of waste heat which could be utilised in district heating systems (Ramboll Group, 2019). Existing technology (such as heat pumps) to capture excess heat should be required and used to increase data centres' energy efficiency. The Climate Action Plan should require that data centres are only granted planning permission if they provide infrastructure to recover and utilise waste heat. This may require only granting data centres planning permission adjacent to where district heating systems are located.

## Conclusion

We applaud the County Council for its ambitious actions specified in the Draft Climate Action Plan. In our submission, we have outlined actions we believe add to the existing plans in order to fulfil the commitments to climate action and emissions reduction targets, thereby safeguarding the county's and Ireland's citizens, nature, and climate.

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