



26 February 2026

Ms. Marie Donnelly
Chair
Climate Change Advisory Council
McCumiskey House
Richview, Clonskeagh Road
Dublin 14
D14 YR62

By email: chair@climatecouncil.ie

Dear Marie,

Firstly, let me take this opportunity to thank you and the Climate Change Advisory Council (CCAC) for all of your work in advising Government on climate policy development and assessing progress on achieving Ireland's National Climate Objective. Since taking Office, your own, and the Council's, views, insights and recommendations have been very helpful to me as Minister. I know your own term as chair is coming to an end and I particularly want to thank you for your personal leadership and contribution in that role.

I also want to thank the CCAC for its work in bringing forward the proposal for the second Carbon Budget Programme, including a revised proposal for Carbon Budget 3 and a provisional Carbon Budget 4. I know that the process was comprehensive and that the Council has put a lot of time and effort into distilling all the potential models and bringing forward its proposal.

As you know, due to the timing of the General Election, and the formation of Government and Oireachtas committees, the process for the Government and Oireachtas considering the proposal has taken much longer than anticipated, with the Joint Oireachtas Committee only last October publishing its report on the proposal.

The Report sets out clearly the views of the Committee on the Carbon Budget proposals and climate action more generally, informed by the series of hearings it undertook. The Report raises a number of questions with the Carbon Budget proposal that require careful consideration before a proposal is brought to Government for approval.

Teach Tom Johnson, Bóthar Haddington, D04K7X4

Tom Johnson House, Haddington Road, D04K7X4

T +353 1 678 2000

www.gov.ie/dcee



The EU has also agreed to a target for 2040 and will be commencing work on the implementation package. The focus on this work raises questions regarding the optimum harmonisation of the Irish system, based around the legislation, a national target, carbon budgets, sectoral emissions ceilings and an annual Climate Action Plan, with the existing and evolving EU system, with different targets, base years, flexibilities and implementing framework across both.

In considering the way ahead, the approach to carbon budgets and the pathway to 2040, it is important to recognise the progress made by the Irish people and the plans and funding in place to support Ireland's climate objectives. In this regard, Ireland has made very significant progress on climate action and GHG reduction since 1990, including:

- Ireland now has the lowest level of GHG emissions in 35 years, notwithstanding the increase of approximately 1.5 million people, more than one million new homes and over one million extra vehicles on our roads;
- Renewable electricity generation has increased fivefold since 2005, such that more than Ireland currently has over 7.8GW of renewable generation capacity. Onshore wind is the largest contributor to this, with circa 5.1GW of wind generation capacity and over 2GW of solar PV installed, with hydro, biomass, and other small sources also contributing. In December, renewables provided close to half of electricity used in Ireland, accounting for 44% of electricity for the month;
- Since 2018, 102,000 homes have received solar panel grants;
- Government has approved an unprecedented investment of €18.9 billion in Grid for the period 2026 – 2030 to be overseen by the Commission for Regulation of Utilities; this investment is fundamental to the electrification of homes, businesses and transport;
- In terms of offshore wind the announcement of the results of the second Offshore Renewable Electricity Support Scheme (ORESS) auction and the commencement of work on the National Designated Maritime Area Plan (DMAP) are very positive progress;
- Ireland's first 4-hour storage facility opening in County Offaly, an area of focus under the Governments Just Transition Programmes;
- A 31% increase in green loans, as per BPF, driven mainly by people investing in their homes;
- The allocation, by the Minister for Enterprise, Tourism and Employment, of €300 million to drive the decarbonisation of Ireland's manufacturing sectors, represents one of the most efficient available decarbonisation investments on behalf of the exchequer in CO2 per euro spend terms;



- The surpassing of our ZEVI EV sales target for 2025 in October, with sales now at 212,000 shows a significant shift in consumer behaviour towards sustainable forms of transport;
- In 2025, the Government provided 18,000 EV and home charger grants;
- Passenger numbers across Public Service Obligation (PSO) services reached an all-time high of more than 363.5 million journeys. This significant growth marks the second consecutive year of record-breaking figures and confirms that public transport usage has not only recovered from the pandemic but now exceeds pre-2019 levels;
- Last year the Government invested over €40m to help businesses reduce energy costs, through SEAI, with 90% of grants available for immediate approval;
- The delivery of 1,100 home retrofits per week in 2025, including 8,000 to households at risk of fuel poverty.
- To further drive retrofit, I have recently announced the National Residential Retrofit Plan, which will revise and improve the provision of grants and financing models for homeowners; and,
- The installation of solar panels in over 2,000 schools, funded by the Climate Action Fund; turning a levy on fossil fuels into sustainable energy, with schools showing leadership in their communities.

However, while it's important to recognise progress and intent, supported by Government funding and delivery and all the effort of the Irish people, under the current framework the Environmental Protection Agency (EPA) predicted a greater distance to target in 2025. This Government is committed to delivering climate mitigation and adaptation and, in particular, the suite of high impact actions such as the further accelerated deployment of renewable electricity (both onshore and offshore), the electrification of the transport fleet and phasing out of the use of fossil fuels in space and process heating that will support this.

I know that both you and the Council have consistently pointed to the need for an increased implementation focus. That is my main focus as Minister and I want to ensure that the national framework is optimally aligned with the EU counterpart to fully support that objective. To support this new Governance is in place included a re-vamped Top-Level Delivery Board which I now chair.

In light of all the foregoing, and before I bring proposals to Government around the next steps relating to the new Carbon Budget Programme and Climate Action Plan, it would be beneficial for me to have the views of the Council on a range of matters that could better inform Ireland's approach to climate action.

I am, therefore, seeking the Council's input on how Ireland's climate legislative and policy framework aligns with its national and international obligations and the legal frameworks that govern their implementation, to support the Irish Government and



people to continue to deliver the high impact measures we have set out in the Climate Action Plan and future measures that will be needed to meet national and EU obligations.

In this regard, and further to our discussions around the emerging legal position, I am seeking the Council's views, in particular, on the following issues:

- Does the State's current statutory obligation to prepare an annual Climate Action Plan support an implementation focus? Does the national approach align optimally with the EU requirement for longer term plans? In this regard, I have received significant feedback from stakeholders that the current national approach is too focussed on the annual forward planning process at the expense of an increased implementation focus. Furthermore, I understand that Ireland is an outlier internationally in having this annual statutory obligation.
- Are the provisions of the Climate and Low Carbon Development Act, 2015 (as amended) optimally aligned with the EU framework including the ETS, ETS II, ESR, LULUCF, Renewable Energy Directive (RED) and Energy Efficiency Directive (EED) targets and provisions? In this regard, feedback received has pointed to potential confusion with two parallel frameworks where the national regime was put in place before the wider, binding EU regime, with its different reference periods and targets. Furthermore, questions arise as to the most appropriate balance between the requirements of the various legal Instruments at EU level.
- Are the Irish and EU systems working optimally together, given the accountability regime at national and EU level, the availability and role of flexibilities at EU level (ETS, ESR and LULUCF) and the implementation and accountability regime in place at national level? In this respect, the Council's views on international best practice would be welcomed. Based on independent analysis, simplification and clear accountability with strong implementation focus and funding appear to be to the fore in the best performing international comparators.
- Does the current approach to carrying forward carbon budget exceedance / surplus support or hinder the multi-annual delivery of high impact measures and take account of the EU flexibilities and implementation mechanisms referred to above?
- Is the current national treatment of LULUCF optimal taking account of EU requirements and given the uncertainty and volatility in the accounting for the LULUCF sector GHGs?
- What is the optimal alignment of national and EU climate action regimes in light of the forthcoming development of the EU 2040 implementation framework and Ireland's input into same?

I would also welcome the Council's views on the aforementioned Report from the Joint Oireachtas Committee, as part of my analysis and consideration of same.



More generally, I would welcome the views of the Council on how Ireland can build on the significant progress to date and learn from international best practice to deliver accelerated high impact measures in the years ahead.

I look forward to engaging with the Council on these matters and my officials are available to talk through these issues in more detail.

Yours sincerely,

Darragh O'Brien TD.

Minister for Climate, Energy and the Environment;

Minister for Transport