



**Chambers  
Ireland**  
Advancing business together



# Chambers Ireland's Submission to the Department of the Environment, Climate and Communications' Consultation on the Draft National Biomethane Strategy

March 2024

## About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Our Network has pledged to advocate for and support the advancement of the United Nations Sustainable Development Goals (SDGs) and, in 2023, we were appointed to be an SDG Champion as part of the 2023-2024 SDG Champions Programme. Accordingly, we use the Goals as a framework to identify policy priorities and communicate our recommendations. We have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), gender equality (SDG 5), industry, innovation and infrastructure (SDG 9) and climate action (SDG 13).<sup>1</sup>

In the context of the current consultation, a biomethane strategy for Ireland can have positive and far-reaching benefits in relation to climate action. However, more broadly, being a clean energy economy will have an enormous effect on our capacity to support decent work and economic growth (SDG 8), affordable and clean energy (SDG 7), and the effective delivery of a suite of policies that are of vital interest to our industry, innovation, and infrastructure (SDG 9) opportunities. It is for these reasons that we are submitting a response to this consultation.

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<sup>1</sup> The Chambers Ireland SDGs. Available at: <https://chambers.ie/sustainable-development-goals/>

## Chambers Ireland's Perspective

Chambers Ireland welcomes the open consultative process and the broad engagement with stakeholders on the Draft National Biomethane Strategy.

A long-term focus on reaching our climate targets requires coordinated action and a clear roadmap for all stakeholders across both the public and private sectors. We welcomed the increased production target of 5.7 TWh of biomethane by 2030, which will replace approximately 10% of current natural gas use in Ireland and reduce our over-reliance on imported energy.

We have been set the goal to reduce the extent of further global warming, by pursuing and achieving, “by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy”. The interim goal of achieving a 51% reduction in greenhouse gas emissions by 2030 compared to 2018 levels also sets a clear parameter for the actions we need to take and the level of activity that needs to be implemented if we are to meet these targets and achieve meaningful results. In 2021, Ireland had one of the highest rates in the EU of greenhouse gas emissions per capita, with agriculture making up the largest share per sector and representing 37.5% of total emissions. Biomethane offers an alternative solution that will help us divest from imported natural gas, ensure greater energy security and offers the agri-sector an opportunity to diversify and support decarbonisation.

Achieving the 5.7 TWh goal will require the creation of a robust strategy that engages all relevant stakeholders and offers crucial operational support that can ensure every actor in the value chain can benefit and help grow this emerging industry.

## Questions

1. Which of the following best describes you? Farmer, Developer, Energy producer, NGO, Landowner, Forester, Researcher, Private Sector, Public Sector, Other (please specify).

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2. The Draft National Biomethane Strategy was developed around five key pillars:
  - i. Sustainability
  - ii. Demand for Biomethane
  - iii. Bioeconomy and Circular Economy
  - iv. Economics of Biomethane
  - v. Enabling Policy Requirements.

**Do you agree with these key pillars?**

Chambers Ireland agrees with the five pillars that have been developed as part of the Draft National Biomethane Strategy, however, it would be positive to see a stronger recognition of the role that biomethane can play in Ireland's energy security. This is particularly significant for hard to decarbonise sectors that may struggle to find alternative and feasible energy solutions as part of the green transition.

3. What key learnings should Ireland's biomethane sector ensure it follows from the growing biomethane sector in Europe? Please select all that apply.
  - Scale
  - Feedstock Mix
  - Regulations and Policy
  - Supports
  - End Uses
  - None of the above.

Ireland should be ready and willing to take learnings across all levels from Europe. Where biomethane industries are successful and fully operational, we can learn from the advantages and disadvantages and apply this to our domestic sector. Research and innovation within this sector is constantly evolving, so an Irish strategy for Biomethane should ensure flexibility to grow and develop as new learnings emerge.

**4. Based on the scenario analysis completed for the Draft National Biomethane Strategy (Page 14):**

- **Scenario 1: Widespread Deployment**
- **Scenario 2: Current Policies Only**
- **Scenario 3: Economic Deployment.**

**Which scenario do you think is optimal in terms of a biomethane sector in Ireland (this can be a combination of more than one scenario)? Please rank from 1-3.**

Scenario 3, which relates to economic deployment, should be prioritised. Such a scenario creates a viable opportunity for larger plants to evolve and develop over time in tandem with the growth in demand for biomethane. Moving to larger scale production will improve efficiencies, reduce costs and increase the attractiveness of the sector.

**5. As shown in the Draft Strategy, biomethane is more expensive than fossil gas. Based on the analysis set out in the document, in addition to the introduction of a Renewable Heat Obligation, what support mechanism is optimal (in terms of cost, time to deliver, funding) for delivering 5.7 TWh by 2030? (Please rate 1 -3 with 1 being the most optimal).**

- **Capital Support**
- **Operational Support**
- **Feedstock Support**

Operational support is the most optimal support mechanism, as this will be fundamental in securing a sustainable future for the sector. Operational support schemes will create market certainty for developers and stimulate growth, which will simultaneously encourage investment, reduce risk and bring down costs associated with production. Such supports will need medium to long term commitments if these results are to be realised and the benefits are to be scalable.

**6. Sustainability of biomethane production is a key priority as set out in the Draft National Biomethane Strategy. Can Biomethane be sustainably produced in Ireland?**

Yes. This is indicated by the research included in the Draft Strategy. Ongoing assessment and evaluation of Biomethane inputs and outputs should be a key priority of the strategy into the future. It is important that the latest research and innovation in this space can be harnessed and applied to Ireland's emerging domestic biomethane sector to ensure sustainable practices and processes can be improved upon and streamlined over time.

Advancing a biomethane strategy for Ireland is underpinned by the twin priorities of ensuring a sustainable and secure energy future for the country, which means minimising our reliance on imported natural gas and displacing emissions from fossil fuels.

**8. The Draft Biomethane Strategy commits to developing a 'Biomethane Charter' which aims to increase the sustainability and environmental benefits of biomethane production in Ireland. What inputs would you like to see assessed here? Please select all that apply:**

- a. Feedstocks
- b. Plant Design
- c. Digestate
- d. Operation of the Plant
- e. Other (please specify).

Chambers Ireland supports the proposed development of a Biomethane Charter and the spotlight this would place on increasing the sustainable and environmental benefits of biomethane production in Ireland. All of the above input areas are important and relevant in the creation of such a charter but it will only be effective where there is buy-in from all relevant stakeholders.

**11. What is the optimal end use for Biomethane in Ireland? Please rate 1 – 5.**

- i. High Temperature Heat
- ii. Transport Sector
- iii. Food Industry
- iv. Electricity Sector

## v. Built Environment

Biomethane usage in heating and transport could be most beneficial, as these are hard-to-decarbonise sectors where the versatility of biomethane could offer significant benefits, particularly where it can be transported directly via the gas network. This will require investment and upgrading of the current network, which should be an important aspect of the biomethane strategy to ensure its efficient deployment.