11. CLIMATE

11.1 Introduction

This chapter identifies, describes, and assesses the potential significant direct and indirect effects on climate arising from the construction, operation and decommissioning of the Prospective Development and has been completed in accordance with the EIA guidance and legislation set out in Chapter 1: Introduction. The full description of the Prospective Development is detailed in Chapter 4 of this EIAR.

The objective of this assessment is to assess the potential effects that the Prospective Development may have on Climate and set out proposed mitigation measures to avoid, reduce or offset any potential significant effects that are identified. Chapter 16: Major Accidents and Natural Disasters of this EIAR consolidates the risks and vulnerabilities identified throughout all EIAR chapters to assess the overall risk of the Prospective Development concerning major accidents and natural disasters, including climate change.

The aim of the Meenbog Wind Farm, when in operation, is to reduce the input of carbon intensive energy into the national grid and reduce the amount of greenhouse gas emissions being released to the atmosphere that are associated with electricity generation. Harnessing more energy by means of renewable sources will reduce dependency on fossil fuels, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment.

As detailed in Section 1.1.1 in Chapter 1 of this EIAR, the various development components are described and assessed using the following references: 'Subject Development', 'Existing Development', 'Prospective Development', 'Permitted Development', 'Site', 'Wind Farm Site', 'Grid Connection Site', 'BMEP Site', 'Grid Connection', '2017 EIAR' and 'proposed turbines' or 'proposed turbine locations'.

11.1.1 Background

The Wind Farm Site is located within a rural, agricultural setting in County Donegal approximately 8 km southwest of the twin towns of Ballybofey and Stranorlar and approximately 12 km northeast of Donegal Town at its nearest point. The Grid Connection Site extends southwest from the Wind Farm Site for approximately 6 km along the N15 National Road towards Donegal Town before exiting the N15 to the southeast and following Local Roads, adjacent agricultural land and private access track to the Clogher 110kV substation. The BMEP Site is comprised of two parcels of land consisting of coniferous forestry and associated forestry access tracks. The BMEP Site is located in the townland of Tievecloghoge and comprises two land parcels, referred to as Parcel 1 (to the east) and Parcel 2 (to the west). Parcel 2 is located approximately 2.3km east of the Wind Farm Site, and Parcel 1 is located approximately 4.2km east of the Wind Farm Site. The Site is also served by a number of existing roads and tracks.

The existing Grid Connection runs from the onsite 110kV substation to Clogher 110kV substation, primarily via the N15 National Road and Local Roads.

Current land-use on the Wind Farm Site is comprised of the partially constructed Meenbog Wind Farm and areas of commercial forestry and blanket bog. The surrounding land-use predominantly comprises peat bogs, commercial forestry, rough grazing and agriculture, with limited residential use along local roads.

Current land-use along the Grid Connection comprises of public road corridor and private track. Land-use on the wider landscape comprises a mix of pastoral agriculture, peatlands, commercial forestry, low-density residential, and small-scale commercial properties.

11.1.2 Statement of Authority

This section of the EIAR has been drafted by Robert Kennedy, with support from Catherine Johnson and Keelin Bourke and reviewed by Sean Creedon, all of MKO.

Robert is a Project Environmental Scientist working as part of MKO's Renewables Team, with over four years of experience in private consultancy. Robert holds a BSc in Environmental Biology and an MSc in Environmental Policy, both from University College Dublin. Robert's key strengths and areas of expertise are in project management, environmental impact assessment reporting, renewable energy, report writing, and research. Since joining MKO in 2022, Robert has worked with and coordinated large multi-disciplinary teams involved in the production of EIARs for large-scale renewable energy developments. Robert's experience spans a broad range of wind energy developments, including applications for new onshore and offshore wind farms, repowering and lifetime extension projects, and substitute consent. Robert also played a role in developing MKO's new service offering around Biodiversity Net Gain and other nature-positive mechanisms.

Catherine is an Environmental Scientist and Climate Practitioner at MKO with over three years of consultancy experience in renewable energy projects. Catherine has expertise in greenhouse gas assessments, international climate law and policy, earth science, and sustainability/ESG processes. Catherine possesses skills in mapping and design, which complement her experience in preparing comprehensive reports for EIAs with a particular focus on climate change. Catherine has a BSc in Earth and Ocean Science and an LLM in Global Environment and Climate Change Law.

Keelin is an Environmental Scientist with MKO, with over 2 years' experience in private consultancy, having joined the company in September 2023. Keelin holds a BSc (Hons) in Environmental Science from University College Cork and an MSc (Dist) in Environmental Engineering from Trinity College Dublin. Keelin's current key strengths and areas of expertise are in environmental mapping, environmental surveying, and environmental report writing. Keelin has experience in conducting environmental impact assessments of a broad range of topics, including population and human health assessments, air quality assessments, assessments of built services and infrastructure and major accidents and natural disaster risk assessments for both onshore and offshore wind energy projects. Prior to taking up her position with MKO, Keelin worked as an Environmental Health and Safey Officer in an EPA licensed Waste Transfer Facility in Cork City. Since joining MKO, Keelin has become a member of the MKO Environmental Renewables Team and has been involved in preparing and managing Environmental Impact Assessments and in leading large multi-disciplinary teams in order to produce robust Environmental Impact Assessment Reports for large-scale onshore and offshore wind energy developments.

Sean Creedon is an Associate Director in the Environment Team at MKO. He leads a team of highly skilled environmental professionals working on EIAR for large-and medium scale Renewable Energy infrastructure. Sean has directed and overseen multiple renewable energy projects across wind, solar, battery, biogas and hydrogen as well as a range of thermal and other energy related developments. He has worked on the planning and environmental impact elements within all stages of wind farm project delivery. Sean's professional experience includes the development and management of a portfolio of wind farm developments to the consenting decision. He is a member of the MKO senior management team. Sean has over 24 years' experience in program and project development, holds an MSc from NUI Galway and a Diploma in Project Management from Institute of Project Management Ireland.

11.1.3 Chapter Structure and Climate Study Areas

This chapter of the EIAR provides an assessment of the potential significant direct and indirect effects on climate arising from all phases of the Prospective Development.

The chapter structure is as follows:

- A review of all relevant climate change legislation policy and guidance applicable to the Prospective Development in an international, national, and local context (Section 11.2)
- Presentation of the baseline environment (Section 11.3 below), including:
  - A description of the current baseline environment established from desk study, utilising relevant datasets and data provided within other sections of the EIAR (Section 11.3.1 below)
  - A description of the future baseline environment, established from desk study, utilising relevant datasets and data provided within other sections of the EIAR (Section 11.3.2 below)
- A detailed carbon assessment, which considers how the Prospective Development will affect the greenhouse gas emissions associated with Ireland as a result of activities associated with construction, operation, and decommissioning phases (inclusive of both carbon losses and carbon savings) (Section 11.4 below)
- Presents an assessment of the potential likely significant effects on climate arising from the Prospective Development during the construction phase (Section 11.5.2) operational phase (Section 11.5.3), and decommissioning phase (Section 11.5.4) based on the information gathered and the analysis and assessments undertaken.
  - All required mitigation measures to prevent, minimise, reduce or offset the likely significant environmental effects identified in the construction phase, operational phase, and decommissioning phase is provided in this section.
- An assessment of potential cumulative impacts is provided in Section 11.6 and details any potential cumulative effects on climate between the Prospective Development and other permitted or proposed projects and plans in the area, (wind energy or otherwise) for the construction phase (Section 11.6.1), operational phase (Section 11.6.2), and decommissioning phase (Section 11.6.3)
- Presents an assessment of the potential likely significant in-cumulation effects on climate arising from the both the Prospective Development and the Existing Development (the Subject Development) based on the information gathered and the analysis and assessments undertaken.
  - All required mitigation measures to prevent, minimise, reduce or offset the likely significant environmental effects identified in the construction phase, operational phase, and decommissioning phase is provided in this section.
- An assessment of potential cumulative impacts is provided in Section 11.6 and details any potential cumulative effects on climate between the Subject Development and other permitted or proposed projects and plans in the area, (wind energy or otherwise) for the construction phase (Section 11.8.1), operational phase (Section 11.8.2), and decommissioning phase (Section 11.8.3)
- An assessment of potential transboundary impacts of the Subject Development is provided in Section 11.9 and details any potential transboundary effects on climate due to the Subject Development.

By their very nature, the impacts and resulting effects of greenhouse gas emissions are global rather than affecting one localised area. For the purposes of this EIAR, the overall Climate Study Area for the Prospective Development is defined as the national environment (Ireland), where the receptor is the climate and the global atmosphere. As stated in the IEMA 2022 guidance *"greenhouse gas emission impacts and resulting effects are global rather than affecting one localised area"*[1]. Therefore, effects arising from the potential impacts on climate are considered to impact on a national level. National, regional and local data has been considered where relevant and available. The study areas considered across the different assessments provided within this report are detailed below.

[1] *IEMA (2022). Assessing Greenhouse Gas Emissions and Evaluating their Significant, 2nd Edition. Available online at: https://www.iema.net/resources/blog/2022/02/28/launch-of-the-updated-eia-guidance-on-assessing-ghg-emissions*

Baseline Environment

- Current Baseline
  - Current Baseline Study Area: the Site boundary, as illustrated in Figure 1-1 of Chapter 1 of this EIAR. Relevant information taken from EIAR Chapters for inclusion in the current baseline assessment is within the relevant discipline's specific assessment boundary, as identified in each cited EIAR Chapter.
- Future Baseline
  - Future Baseline Study Area: the Site boundary, as illustrated in Figure 1-1 of Chapter 1 of this EIAR. Relevant information taken from relevant EIAR Chapters for inclusion in the future baseline assessment will be within the relevant discipline's specific assessment boundary, as identified in each cited EIAR Chapter.

Carbon Assessment

- Carbon Assessment Study Area: the Site boundary, as illustrated in Figure 1-1 of Chapter 1 of this EIAR.

11.1.4 Scoping and Consultation

Health Service Executive

A scoping response was received from the Health Service Executive (HSE) on the 3rd October 2025, and a follow up response was received on the 10th of April 2026, following the follow up in March Scoping. The HSE noted that the assessment should include the impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage, and the potential for soil erosion. The HSE stated that a Construction Environmental Management Plan (CEMP) should be included which details dust control and mitigation measures. The HSE recommends a peat stability monitoring programme as set out in the Scottish Government's '*Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017*'.

Appendix 8-1 of this EIAR contains a Peat Stability Assessment of the Prospective Development, with further detail on the impact of the construction of the Prospective Development on the future stability of the Site. Appendix 4-3 CEMP of this EIAR, contains details on the dust control and other mitigation measures which will be in use during the construction of the Prospective Development.

Department of Climate, Energy and the Environment

A scoping request was issued to the Department of Climate, Energy and the Environment in September 2025 and a follow up in March 2026. No response has been received to date.

Environmental Protection Agency

A scoping request was issued to the Environmental Protection Agency (EPA) in September 2025 and a follow up in March 2026. No response has been received to date.

Sustainable Energy Authority Ireland

A scoping request was issued to Sustainable Energy Authority Ireland (SEAI) in September 2025 and a follow up in March 2026. SEAI responded stating that they are not Statutory Consultees for Onshore Wind projects and as such have no input into Onshore Wind Planning Applications.

11.1.5 Limitations and Difficulties Encountered

This EIAR has been carried out based on the availability of the information relating to the construction, operation and decommissioning of the Prospective Development. No limitations were encountered during the preparation of this assessment that would materially affect the conclusions of this report.

11.2 Climate Legislation, Policy and Guidance

Although variation in climate is thought to be a natural process, the rate at which the climate is changing has been accelerated rapidly by human activities. Climate change is one of the most challenging global issues facing the world today and is primarily the result of increased levels of greenhouse gases in the atmosphere. Increasing human emissions of carbon dioxide and other greenhouse gases cause a positive radiative imbalance at the top of the atmosphere, meaning energy is being trapped within the climate system. The imbalance leads to an accumulation of energy in the Earth system in the form of heat that is driving global warming.[2,3] Greenhouse gases come primarily from the combustion of fossil fuels in energy use.

In March 2024 the European Environment Agency (EEA) published the European Climate Risk Assessment.[4] This assessment states that Europe is the fastest warming continent on the planet and is warming at about twice the global rate. The average global temperature in the 12-month period between February 2023 and January 2024 exceeding pre-industrial levels by 1.5°C. 2023 was the warmest year on record in more than 100,000 years, at 1.48°C above pre-industrial levels, with the world's ocean temperature also reaching new heights.

The Intergovernmental Panel on Climate Change (IPCC), in their AR6 Synthesis Report: Climate Change 2023[5], state that widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred. This has led to widespread adverse impacts and related losses and damages to people and nature due to the pressures of climate change and the inability to adapt to a rapidly changing environment. Moving away from our reliance on coal, oil and other fossil fuel-driven power plants is essential to reduce emissions of greenhouse gases and combat climate change.

Relevant legislation, policy, and guidance in an international (Section 11.2.1), national (Section 11.2.2), and local (Section 11.2.3) context are detailed below.

11.2.1 International Greenhouse Gas Emission and Climate Targets

Globally, governance relating to climate change has changed significantly since 1994 when the United Nations Framework Convention on Climate Change (UNFCCC) entered into force. Greenhouse gas

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[2] Hansen, J.; Sato, M.; Kharecha, P. et al. Earth's Energy Imbalance and Implications. Atmospheric Chemistry and Physics 2011, 11 (24), 13421–13449. https://doi.org/10.5194/acp-11-13421-2011
[3] von Schuckmann, K.; Palmer, M. D.; Trenberth, K. E. et al. An Imperative to Monitor Earth's Energy Imbalance. Nature Clim Change 2016, 6 (2), 138–144. https://doi.org/10.1038/nclimate2876.
[4] European Environment Agency (2024) European Climate Risk Assessment <https://www.eea.europa.eu/publications/european-climate-risk-assessment>
[5] IPCC AR6 Synthesis Report: Climate Change 2023. https://www.ipcc.ch/report/sixth-assessment-report-cycle/

emissions have been a primary focus of climate related international agreements for almost two decades.

Table 11-1 below identifies international instruments relating to greenhouse gases and climate change targets. The following table provides an overview of the international agreements that have played key roles in establishing climate governance; please refer to Appendix 11-1 '*Climate Legislation, Policy, and Guidance*' for further detail on each of the below international instruments.

Table 11-1 International Instruments Relating to Greenhouse Gases and Climate Change Targets

International Instrument	Description
Kyoto Protocol	The Kyoto Protocol was adopted on 11 December 1997; this Protocol operationalised the UNFCCC and was the first international agreement that committed countries to reduce their greenhouse gas emissions. The Kyoto Protocol came into effect in 2005, as a result of which, emission reduction targets agreed by developed countries, including Ireland, became binding for the first time.
Doha Amendment to the Kyoto Protocol	In Doha, Qatar, on 8th December 2012, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes: - New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from starting in 2013 and lasting until 2020. - A revised list of greenhouse gases to be reported on by Parties in the second commitment period; and
Conference of the Parties (COP): *Every year since 1995, the Conference of the Parties (COP) has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments, and is the supreme decision-making body of the UNFCCC.*	**COP21 – Paris** (30th November to 12th December 2015) COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The twelve-page text, made up of a preamble and 29 articles, provides for a limitation of the temperature rise to below 2°C above pre-industrial levels and even to tend towards 1.5°C.
	COP25 – Madrid (December 2nd to December 13th, 2019) At COP25 the European Union launched its most ambitious plan, 'The European Green Deal' which aims to lower CO_2 emissions to zero by 2050.
	COP28 – Dubai (30th of November 2023 to the 13th of December 2023) COP28 resulted in a landmark deal to 'transition away' from fossil fuels, the United Arab Emirates (UAE) Consensus. The agreement calls for 'transitioning away from fossil fuels in energy systems, in a just, orderly, and equitable manner.' COP28 concluded the first ever Global Stocktake under the Paris Agreement. The Global Stocktake recognises that the world is not on track to meet 1.5°C and will require Parties to align their national targets and measures with the Paris Agreement.
	COP29 – Azerbaijan (11th November 2024 to 22nd November 2024) COP29 focused on accelerating global efforts to address climate change, in particular global efforts related to climate finance. The New Collective Quantified Goal on Climate Finance (NCQG) was agreed in the final days of COP with developed nations agreeing to triples finance to developing countries, with commitments increasing from USD 100 billion annually to USD 300 billion annually by 2035.

	Significant progress was made in the discussions surrounding carbon markets, with nearly 200 nations agreeing on critical rules under Article 6 of the Paris Agreement. The adoption of these rules is seen as a crucial step towards operationalising a robust and credible carbon market. Despite the advances, concerns were expressed about the potential for weak governance and risks of exploitation in the system; these issues must be addressed to ensure the market's full functionality. **COP30 – Belém** (10th November 2025 to 21st November 2025) The 30th UN Climate Change Conference in Belém, Brazil concluded with a mix of political progress and unresolved tensions. Parties adopted the “Belém Political Package,” reinforcing the Paris Agreement’s goals and calling for tripling adaptation finance by 2035 to help vulnerable countries cope with climate impacts, alongside a set of 59 voluntary indicators to track adaptation progress. New mechanisms were launched to bridge the gap between pledges and implementation, including the Global Implementation Accelerator and the Belém Mission to 1.5˚C, reflecting a growing focus on turning plans into action. A just transition mechanism and a Gender Action Plan were agreed to support equitable transitions that protect workers, Indigenous groups, and marginalized communities. Progress was also made on nature protection, with initiatives like the Tropical Forests Forever Facility to finance tropical forest conservation. However, negotiators failed to include a formal roadmap for phasing out fossil fuels or a zero-deforestation commitment in the core COP text, highlighting persistent geopolitical divides and the challenge of securing broad consensus. Despite these outcomes, leaders emphasised the urgency of deep emissions cuts and stronger climate finance to stay aligned with the 1.5˚C target.
United Nations Sustainable Development Goals	On the 14th July 2025, the United Nations published ‘The Sustainable Development Goals Report 2025’ this report finds that, following an assessment of all 169 targets, for which trend data is available, only 17% of the SDG targets are on track, 18% of SDG targets are showing minimum or moderate progress, 47% having stalled in progress and 18% having regressed from 2024.
Climate Change Performance Index	Established in 2005, the Climate Change Performance Index (CCPI)[6] is an independent monitoring tool which tracks individual countries climate protection performance. Ireland, ranked 43rd in 2024, has risen 14 places to 29th for 2025, and is now considered a ‘medium’ performer in international performance. The CCPI states that Ireland’s policies are missing a long-term strategy for phasing out fossil fuel infrastructure and shifting investments from natural gas towards an emissions-neutral energy supply.
State of the Global Climate 2024	In March 2025, the World Meteorological Organisation (WMO) published a report entitled the ‘State of the Global Climate 2024’. This report provided a summary on the state of the climate indicators in 2023 with sections on key climate indicators, extreme events and impacts. The key messages in the report include: - Greenhouse gases reached record observed levels in 2023. Real time data indicate that they continued to rise in 2024. - The annually averaged global mean near-surface temperature in 2024 was 1.55 ˚C ± 0.13 ˚C above the 1850–1900 average used to represent pre-industrial conditions.

[6] *Climate Change Performance Index 2024* <https://ccpi.org/>

Renewable Energy Directive	The first Renewable Energy Directive (RED)[7] is legislation that influenced the growth of renewable energy in the EU and Ireland for the decade ending in 2020. From 2021, RED was replaced by the second Renewable Energy Directive (REDII),[8] which continues to promote the growth of renewable energy out to 2030. REDII introduced a binding EU-wide target for overall RES of 32% in 2030 and requires Member States to set their national contributions to the EU-wide target. As per the National Energy and Climate Plan (NECP) 2021-2030, Ireland's overall RES target is 34.1% in 2030. Given the need to ratchet up the EUs clean energy transition, RED was revised in 2023, and the amending Directive EU/2023/2413 (REDIII)[9] entered into force on 20 November 2023 and was transposed into Irish Law in August 2025. REDIII amended the EU-wide overall 2030 RES target from 32% to at least 42.5% with the aim of 45%.
European Green Deal	The European Green Deal is a comprehensive package of policy initiatives aimed at achieving climate neutrality across the EU by 2050. It features a wide range of actions and targets in different sectors such as energy, transport, industry, environment and agriculture. The goal is to transform the EU into a resource-efficient, competitive circular economy that is fair and inclusive for every individual and region. In its approach to decarbonisation, the EU has split greenhouse gas emissions into two categories, the Emissions Trading System (ETS) and the non-ETS. Under the EU Green Deal, the targets for the ETS and non-ETS sectors will be revised upwards in order to achieve the commitment, at EU level, to reach an economy-wide 2030 reduction in emissions of at least 55%, compared to 1990 levels.
Council Regulation (EU) 2022/2577 and 2024/223	Council Regulation (EU) 2022/2577 and 2024/223 lay down a framework to accelerate the deployment of renewable energy. Regulation 2022/2577 and 2024/223 recognises the relative importance of renewable energy deployment in the current difficult energy context and provides significant policy and legislative support to enabling renewable energy projects. Further detail is provided in Section 1.1.1.8 of Appendix 11-1.
EU Nature Restoration Law	The Nature Restoration Law is the first continent-wide, comprehensive law of its kind. It is a key element of the EU Biodiversity Strategy, which sets binding targets to restore degraded ecosystems, in particular those with the most potential to capture and store carbon and to prevent and reduce the impact of natural disasters. The law aims to restore ecosystems, habitats and species across the EU's land and sea areas in order to › Enable the long-term and sustained recovery of biodiverse and resilient nature › Contribute to achieving the EU's climate mitigation and climate adaptation objectives

[7] Directive 2009/28/EC on the promotion of the use of energy from renewable sources. Available from: https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:140:0016:0062:en:PDF
[8] Directive (EU) 2018/2001 on the promotion of the use of energy from renewable resources (recast). Available from: https://eurlex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018L2001
[9] Directive (EU) 2023/2413 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources and repealing Council Directive (EU) 2015/652. Available from: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302413

	Meet international commitments The EU Nature Restoration Law was approved on June 17th, 2024; EU countries are expected to submit National Restoration Plans to the Commission within two years of the Regulation coming into force (by mid-2026), showing how they will deliver on the targets. They will also be required to monitor and report on their progress.
EU Effort Sharing Regulation	Emissions from all other sectors, including agriculture, transport, buildings, and light industry are covered by the EU Effort Sharing Regulation (ESR). This established binding annual greenhouse gas emission targets for Member States for the period 2021–2030. Ireland is required to reduce its emissions from these sectors by 30% by 2030, relative to 2005 levels. Please see Section 1.1.1.10 of Appendix 11-1 for further details on the EU ESR

11.2.2 National Greenhouse Gas Emission and Climate Targets

Ireland has reached a crucial point in addressing climate change with a goal to becoming climate neutral by 2050 and to significantly cut greenhouse gases by 2030. National greenhouse gas emission and climate targets are critical for achieving Irelands climate ambitions.

Table 11-2 below provides an overview of national legislation and reports relating to greenhouse gases and climate change targets in Ireland; please refer to Appendix 11-1 for further detail on each of the below national legislation measures.

Table 11-2 National Legislation and Reports relating to Greenhouse Gases and Climate Change Targets

National Instrument	Description
Programme for the Government – Securing Irelands Future	The Programme for Government – Securing Irelands Future was published in January 2025. The programme notes that the government are committed to reducing greenhouse gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050. The Programme states the Government's ongoing support and commitment to take "*the necessary action to deliver at least 70% renewable electricity by 2030*".
Climate Action and Low Carbon Development Act 2015	The Climate Action and Low Carbon Development Act 2015 established the national framework for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy.
Climate Action and Low Carbon Development (Amendment) Act 2021	The Climate Action and Low Carbon (Amendment) Act 2021, amended the Climate Action and Low Carbon Development Act 2015 and is a piece of legislation which commits the country to move to a climate resilient and climate neutral economy by 2050. This was passed into law in July 2021. The Programme for Government has committed to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade, and to achieve net zero emissions by 2050. This Act will manage the implementation of a suite of policies to assist in achieving these annual targets.
Climate Change Advisory Council 2024	The Climate Change Advisory Council (CCAC) was established on 18th January 2016 under the Climate Action and Low Carbon Development Act 2015. The Annual Review 2024: Electricity report has been released by the CCAC and focuses specifically on key findings and recommendations for the Electricity sector. In 2023, emissions from the sector reduced by approximately 21% from 2022 to the lowest level since records began in 1990. This was driven

	by a considerable decline in the use of coal for electricity generation, coupled with a notable rise in imported electricity.
Carbon Budgets	The first national carbon budget programme proposed by the CCAC, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets. The total emissions allowed under each budget are shown in Section 1.1.2.5 of Appendix 11-1.
Sectoral Emission Ceilings	The Sectoral Emissions Ceilings were launched in September 2022. The Sectoral Emissions Ceilings alongside the annual published Climate Action Plan provide a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030. The Sectoral Emission Ceilings for each 5-year carbon budget period was approved by the government on the 28th of July 2022 and is shown in Section 1.1.2.6 of Appendix 11-1.
Climate Action Plan 2025	The National Climate Action Plan (CAP) 2025 was launched in April 2025. CAP 2025 sets out the roadmap to deliver on Ireland's climate ambition. It aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022 following the Climate Action and Low Carbon Development (Amendment) Act 2021, which commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. CAP 2025 highlights the firm commitment that has been made by Ireland in relation to the clean energy transition and provides an outline of precise goals for renewable energy, focusing on solar, onshore wind, and offshore wind.
Irelands Climate Change Assessment	In 2023 the EPA published Irelands Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes. - Volume 1: Climate Science – Ireland in a Changing World - Volume 2: Achieving Climate Neutrality in 2050 - Volume 3: Being Prepared for Irelands Future - Volume 4: Realising the Benefits of Transition and Transformation Please refer to Section 1.1.2.8 of Appendix 11-1 for further information on the ICCA.

11.2.3 Local Greenhouse Gas Emission and Climate Targets

11.2.3.1 Donegal Local Authority Climate Action Plan 2024-2029

The Donegal County Council Local Authority Climate Action Plan 2024-2029 (Donegal LACAP)[10] was adopted on 21st February 2024 alongside its publication on Donegal County Council's website that same month.

The Donegal LACAP highlights the current state of climate action in Ireland, and how Donegal County Council will take climate action by improving energy efficiency reducing greenhouse gas emissions and embedding climate resilience across its own assets and service.

[10] *Donegal County Council (2024). Donegal County Council Local Authority Climate Action Plan 2024-2029. Available at: https://www.donegalcoco.ie/media/s2cpk5y5/climate-action-plan-english-web-version-v2-1.pdf*

The Donegal LACAP provides a mechanism for bringing together both adaptation and mitigation actions to help drive positive climate action and outcomes across the local authority and its administrative area. The framework of climate actions set within the plan, configures the arrangement of climate actions within a defined structure that ensures alignment between on the ground actions and the high-level vision that the Donegal LACAP aspires to deliver. The Donegal LACAP will help address the mitigation of greenhouse gases, the implementation of climate change adaption measures, and will strengthen the alignment between national climate policy and the delivery of effective local climate action.

Overall, the greenhouse gas emissions generated from County Donegal equated to 1,970 ktCO2-eq in the baseline year, 2019. The top four emitting sectors within County Galway in terms of total greenhouse gas emissions in the baseline year were Agriculture, Residential, Transport and Land Use, Land Change and Forestry (LULUCF) producing 39%, 21%, 15% and 13% respectively of total emissions in County Donegal. Donegal County Council, along with all public sector entities must reduce greenhouse gas emissions by 51% by 2030 as compared to 2019 in line with the National Climate Action Plan 2025 (Section 11.2.2 above).

The Donegal LACAP assesses climate risk relevant to Ireland and to County Donegal, this, plus the evidence baseline, inform the climate objectives and actions that will be undertaken by Donegal County Council to assist in the achievement of national and international climate targets.

During the operational phase, the Prospective Development will assist in reducing emission by facilitating the generation of renewable energy to be fed into the grid and the subsequent decarbonisation of other sectors, in particular the main emitting sectors in County Donegal as identified above. Please see Section 11.4.3 below for further information on carbon savings associated with the Prospective Development.

11.2.3.2 Donegal County Development Plan 2024-2030

The Donegal County Development Plan 2024-2030[11] (DCDP) sets out the overall strategy for the proper planning and sustainable development of the County over a 6-year period. The DCDP includes numerous actions and objectives on sustainability and climate for County Donegal to achieve over the 6-year period.

A key objective identified in the DCDP relating to wind energy is as follows:

- **E-O-2**CC: To secure the maximum potential from the wind energy resources of the County commensurate with the receiving environment and local developments patterns consistent with the proper planning and sustainable development, thereby contributing to the national drive towards ensuring the security of energy supply.

Further detail on local policy relating to wind energy in Co. Donegal can be found in Section 2.6.4 of Chapter 2 of this EIAR.

11.2.4 Relevant Guidance

This chapter of the EIAR has been prepared in accordance with the 'EIA Directive' as amended by Directive 2014/52/EU and in accordance with guidance listed in Section 1.7.2 of Chapter 1. Due to the nature of the Prospective Development, the completion of a wind farm and associated infrastructure, the following methodology and guidance was utilised for the climate section of this EIAR:

[11] *Donegal County Council (2024). Donegal County Development Plan 2024-2030. Available at: https://www.donegalcocodocs.ie/docs/CountyDonegalDevelopmentPlan2024-2030_041125.pdf*

- '*Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment*' (2013) European Commission;
- '*Environmental Impact Assessment Guide to Climate Change Resilience and Adaptation*' (Institute of Environment Management and Assessment (IEMA), 2020);
- '*Calculating Carbon Savings from Wind Farms on Scottish Peat Lands*' (University of Aberdeen and the Macauley Institute 2008);
- '*Wind Farms and Carbon Savings*' (Scottish Natural Heritage, 2003);
- Macauley Institute Carbon Calculator for Wind Farms on Scottish Peatlands (Version 2.15.0) (Macauley Institute, 2023); and,
- Transport Infrastructure Ireland (TII) Carbon Assessment Tool (Version 0.9.0) (TII, 2020)

Consideration has also been given to the '*Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107*' (Transport Infrastructure Ireland, December 2022 (2022a)), '*Climate Assessment of Proposed National Roads – Standard and Overarching Technical Documentation'* (Transport Infrastructure Ireland December 2022b/c) and Transport Infrastructure Ireland Carbon Tool for Road and Light Rail Projects: User Guidance Document, GE-ENV-01106 (TII 2022d).

11.3 Climate and Weather

Climate change projections show that the Earth is getting warmer and extreme weather events are increasing in frequency on an annual basis. The Prospective Development will assist in mitigating these effects through the deployment of clean renewable energy to the national grid and subsequent decarbonisation of energy systems. Changes to climate and weather in Ireland will occur as a result of climate change, for further details on the risks associated with the Prospective Development please refer to Chapter 16 Major Accidents and Natural Disasters of this EIAR.

11.3.1 Baseline Environment

11.3.1.1 Data Sources

A review of literature and data relating to climate change in Ireland was undertaken and utilised to provide an overview of the current baseline environment. The following key data sources were reviewed:

- Met Éireann 30-Year Averages[12];
- Irelands Climate Averages 1991-2020 Summary Report[13];
- Ireland's National Inventory Report 2025[14];
- Climate Status Report for Ireland 2020[15];
- Annual Review 2025 – Our Changing Climate in 2024[16];
- Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6)[17]; and

[12] *https://www.met.ie/climate/30-year-averages*
[13] *Department of Housing, Local Government and Heritage (2024) Irelands Climate Averages 1991-2020 Summary Report <https://edepositireland.ie/bitstream/handle/2262/108695/Ireland%27s_climate_averages_1991-2020_rev2.pdf?sequence=1&isAllowed=y>*
[14] *EPA (2025) Ireland's National Inventory Report <https://www.epa.ie/publications/monitoring–assessment/climate-change/air-emissions/Ireland's-NID-2025.pdf>*
[15] *EPA (2021) Climate Status Report for Ireland 2020 <https://www.epa.ie/publications/research/climate-change/research-386-the-status-of-irelands-climate-2020.php>*
[16] *Climate Change Advisory Council (2025) Annual Review 2025 – Our Changing Climate in 2024 <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC%20AR25%20Our%20Changing%20Climate-final.pdf>*
[17] *IPCC Sixth Assessment report (AR6): Sixth Assessment Report – IPCC*

- World Meteorological Organization (WMO) State of the Global Climate 2025[18].

11.3.1.2 Physical Environment

Ireland has a temperate, oceanic climate, resulting in mild winters and cool summers. The Met Éireann weather station at Malin Head, which is located approximately 78km to the north of the Wind Farm Site, is the nearest weather and climate monitoring station that has meteorological data recorded for the 30-year period from 1991-2020. The Met Éireann weather station in Clones, Co. Monaghan is located a similar distance of 75km southeast to the Wind Farm Site, however this weather station only has data for the 30-year average period from 1978-2007, which has been deemed an inappropriate timescale to determine weather in the existing environment. Meteorological data recorded at the Malin Head weather station over the 30-year period from 1991-2020 is shown in Table 11-3 below. The wettest months are November and December, with April and May being the driest. August is the warmest month with an average temperature of 17.1° Celsius.

Recent monthly meteorological data recorded at Finner Camp, Bundoran, located approximately 33km southwest of the Wind Farm Site, from January 2022 to December 2025 is available at: https://www.met.ie/climate/available-data/monthly-data. February 2022 was the wettest month in this time period, with 180.2mm of rainfall recorded, while September 2024 was the driest month with 44.2mm of rainfall. June 2023 was the warmest month in this time period, with a mean monthly temperature of 16.8° Celsius. December 2022 was the coldest month in this time period, with a mean monthly temperature of 4.4° Celsius.

In addition, Hydro Environmental Service (HES) installed a rain gauge at the Wind Farm Site on 24th November 2020. The daily rainfall volumes from 24th November 2020 to 17th December 2025 have subsequently been recorded and the data is presented in Figure 11-1 of Chapter 9 of this EIAR. The greatest daily rainfall was recorded on 20th February 2022 with 75.6mm of rainfall. During the monitoring period the month with the greatest rainfall was February 2022 with a total volume of 399mm of precipitation recorded at the Wind Farm Site. Note that the rain gauge was not recording correctly between 22nd February and 24th April 2024. Following routine maintenance, the rain gauge resumed operation and continued recording the daily rainfall totals for the Wind Farm Site.

Table 11-4 below provides a summary of the current physical baseline environment with reference to relevant chapters within the submitted EIAR where further information is available.

[18] *State of Global Climate, 2025: State of the Global Climate 2025*

Table 11-3 Data from Met Éireann Weather Station at Malin Head 1991-2020

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
TEMPERATURE (degrees Celsius)													
Mean daily max	8.2	8.4	9.4	11.1	13.3	15.3	17	17.1	15.8	13.1	10.5	8.8	12.3
Mean daily min	3.7	3.7	4.6	6	8	10.4	12.1	12.4	11.1	8.8	6.2	4.3	7.6
Mean temperature	6	6	7	8.6	10.7	12.8	14.5	14.8	13.4	11	8.4	6.6	10
Absolute max.	14.5	14.6	19.9	21.4	25.1	25.2	25.9	25.9	23.4	20.4	17.4	16	25.9
Absolute Min.	-3.9	-3.6	-2.7	-1.5	0.7	2.7	7.1	6.9	3.6	0.4	-1.2	-5.2	-5.2
Mean No. of Days with Air Frost	2	1.7	1.1	0.2	0	0	0	0	0	0	0.3	1.7	7
Mean No. of Days with Ground Frost	6.9	5.8	5.4	2.5	0.6	0.1	0	0	0	0.4	2.3	5.1	29
RELATIVE HUMIDITY (%)													
Mean at 0900UTC	83.4	82.8	81.5	79.1	79.3	81.6	83.2	83	82.5	82.6	83	82.8	82.1
Mean at 1500UTC	80.7	77.7	76.1	74.7	75.5	78.6	79.9	79	77.5	77.4	79.9	81	78.2
SUNSHINE (Hours)													
Mean daily duration	1.3	2.4	3.4	5.3	6.5	5.5	4.7	4.7	3.8	2.6	1.6	1.1	3.6
Greatest daily duration	7.6	9.1	11.6	14.2	16	16.8	16.4	14.6	12.2	10.4	8	6.7	16.8
Mean no. of days with no sun	9.9	5	4.9	2.9	2.3	2	2	3	3.1	5.6	8	10.4	59.1
RAINFALL (mm)													
Mean monthly total	118.9	95.2	80.7	63.4	65	73.8	86	97.8	94.8	110.3	121.6	130.5	1138.1
Greatest daily total	28.4	34.3	31.4	26.3	35	42.2	27.7	73	34.9	38.7	39.4	66	73
Mean num. of days with >= 0.2mm	23.2	20.1	20.9	17.2	17.4	17.7	20.1	20.8	19.9	21.5	23.7	23	245.5
Mean num. of days with >= 1.0mm	18.8	15.8	15.2	12.6	12.2	12.4	15.7	15.7	14.9	17.5	19.8	19.5	190.1
Mean num. of days with >= 5.0mm	9.1	7.2	5.9	4.3	4.2	5.2	6	6.6	6.9	7.5	9	9.2	81.1
WIND (knots)													
Mean monthly speed	9.4	9.2	8.5	7.5	6.9	6.4	6.1	6.5	7.3	8.3	8.8	9	7.8
Max. gust	91	80	73	71	73	62	57	58	71	78	92	96	96
Max. mean 10-minute speed	68	56	52	52	55	47	42	43	49	56	61	67	68
Mean num. of days with gales	10.5	8.7	7.4	3.4	1.8	0.8	0.6	0.7	2.3	5.1	7.2	8.6	57.2

The 30-year Annual Average Rainfall (AAR) and evaporation data for the period 1981-2010[19] was recorded at Ballybofey (Lough Mourne), which is located ~2km northwest of the Wind Farm Site. This data is presented in Table 11-4. The long-term AAR at Ballybofey (Lough Mourne) is 1,931mm/year. However, this rainfall data is likely to underestimate the actual AAR at the Wind Farm Site due to elevation differences. Ballybofey (Lough Mourne) rainfall station stands at an elevation of 101mOD whilst the topography at the Wind Farm Site ranges up to 327mOD.

Met Éireann also provide a grid of AAR for the entire country for the period of 1991 to 2020. Based on this more site-specific modelled rainfall values, the AAR at the Wind Farm Site ranges from 2,004 to 2,185mm/year. The conservative value of 2,185mm/year is taken as the AAR for the Wind Farm Site. This is considered to be the most accurate estimate of AAR from the available desk study sources.

Table 11-4 Average long-term Rainfall Data (mm)

Station		X-Coord		Y-Coord		Ht (MAOD)		Opened		Closed		
Lough Mourne		110700		23500		101		1963		N/A		
Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec	Total
214	152	170	113	101	107	122	154	162	211	204	221	1,931
Wind Farm Site (X-Cord: 205000 Y-Cord:387000)												
Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec	Total
237	199	177	128	126	127	152	165	169	213	235	257	2,185

In addition, HES installed a rain gauge at the Wind Farm Site on 24th November 2020 following the peat slide. The daily rainfall volumes from 24th November 2020 to 17th December 2025 have subsequently been recorded and the data is presented in **Figure 11-1** below. The greatest daily rainfall was recorded on 20th February 2022 with 75.6mm of rainfall. During the monitoring period the month with the greatest rainfall was February 2022 with a total volume of 399mm of precipitation recorded at the Wind Farm Site.

Note that the rain gauge was not recording correctly between the 22nd February and 24th April 2024. Following routine maintenance, the rain gauge resumed operation and continued recording the daily rainfall totals for the Wind Farm Site.

[19] Ballybofey (Lough Mourne) Long term Annual Average Rainfall (AAR) and evaporation data 1981-2010. Source: Met Éireann (www.met.ie)

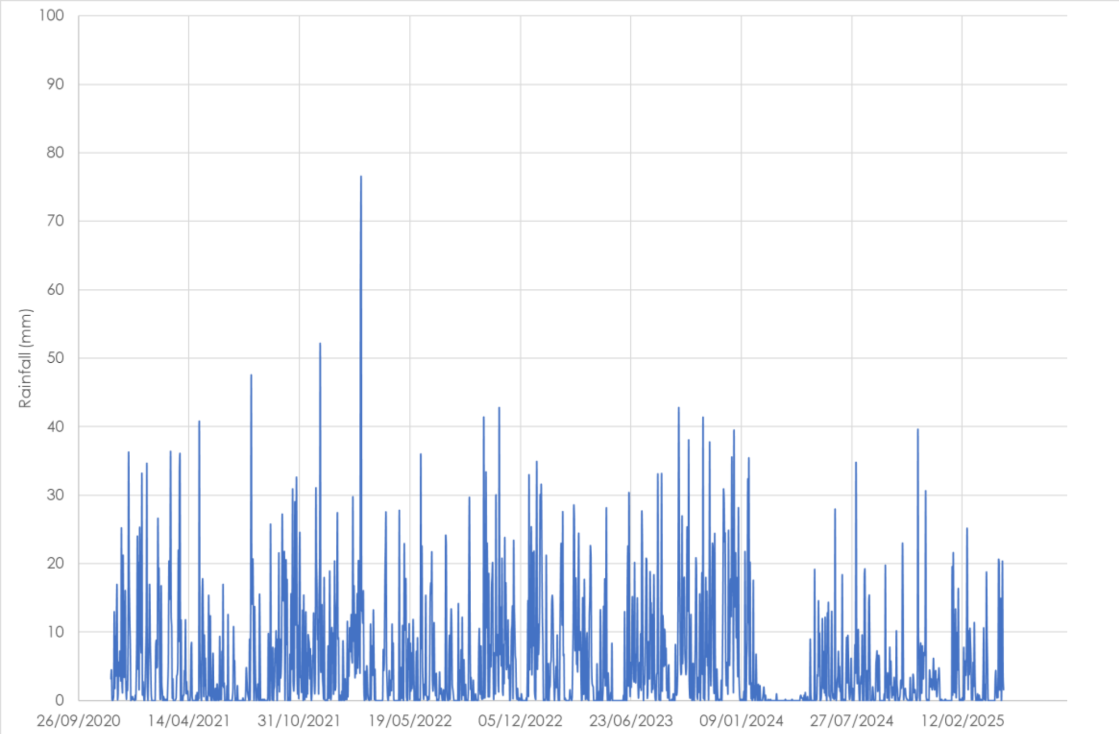

Figure 11-1: Daily Rainfall Data at Site (Dec 2020 – April 2025)

Table 11-5 below provides a summary of the current physical baseline environment with reference to relevant chapters within the submitted rEIAR where further information is available

Table 11-5 Summary of Current Physical Baseline Environment

Climate variable	Summary of current baseline environment	Relevant EIAR chapter (if applicable)
Air Temperature	Climate change is impacting air temperatures in the Northern European region, with a range of observable effects including rising temperature, increased frequency of heatwaves, changes in seasonal temperature patterns and milder winters[20]. Irelands Climate Averages 1991-2020 Summary Report identifies that the annual mean air temperature for Ireland over the period 1991-2020 is 9.8°C. The annual mean air temperature ranges from approximately 8.5°C to 10.8°C. Comparing the 1991-2020 annual mean air temperature for Ireland with that of the 1961-1990 period, there has been an increase of approximately 0.7°C. The Climate Status Report for Ireland 2020[21] states that air temperatures in Ireland have '*been increasing at an average rate of 0.078°C per decade since 1900 and that the annual average temperature is now approximately 0.9°C higher than it was in the early 1900s'*. Temperatures in Ireland are increasing, with sixteen of the top 20 warmest years on record occurring since 1990[22]. On 10th July 2024 Met Éireann confirmed that 2023 was Irelands wettest and warmest year on record (records going back to 1900).[23] Due to the moderating influence of the North Atlantic, Ireland has, and will continue to, experience much milder air temperatures as compared to mainland Europe and other continental countries.[24] However, this moderating influence could be in jeopardy if the Atlantic Meridional Overturning Circulation (AMOC) continues to weaken[25]. The AMOC is a large system of ocean currents responsible for carrying warm water from the tropics into the North Atlantic and the strength of this current is a	Chapter 10 Air Quality

[20] *IPCC (2021) Climate Change 2021: The Physical Science Basis* <https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport.pdf>
[21] *Government of Ireland (2020) Climate Status Report for Ireland 2020* <https://www.epa.ie/publications/research/climate-change/Research_Report_386.pdf>
[22] *Irelands Climate Change Assessment (2023) Volume 1 Climate Science – Ireland in a Changing World* <https://www.epa.ie/publications/monitoring–assessment/climate-change/irelands-climate-change-assessment-volume-1.php>
[23] https://www.met.ie/2023-confirmed-as-irelands-wettest-year-on-record
[24] https://www.met.ie/climate/what-we-measure/temperature. https://www.met.ie/climate/what-we-measure/temperature#:~:text=The%20moderating%20influence%20of%20the,mild%20winters%20and%20cool%20summers
[25] *IPCC (2019) IPCC Special Report on the Ocean and Cryosphere in a Changing Climate Chapter 6. Extremes, Abrupt Changes, and Managing Risk* <https://www.ipcc.ch/site/assets/uploads/sites/3/2022/03/08_SROCC_Ch06_FINAL.pdf>

Climate variable	Summary of current baseline environment	Relevant EIAR chapter (if applicable)
	function of global mean temperature. The weakening of this current would counterbalance the warming effects of climate change creating instability for local ecosystems, agriculture, and fisheries.	
Precipitation	Climate change is impacting precipitation patterns in the Northern European region, with a range of observable effects including increased precipitation, more extreme precipitation events, seasonal variations and impacts on hydrological regimes[26]. Precipitation has been measured systematically in Ireland since the late 19th century and is a key indicator of changes in the climate; measurements and analysis of rainfall are essential for assessing the effects of climate change on the water cycle, water balance and for flood mitigation. Met Éireann highlights that it is already observing these trends, with the national annual average rainfall over the period 1991-2020 being approximately 1,288mm, which represents an increase of 7% from the previous 30-year monitoring period (1961-1990)[27]. Irelands Climate Averages 1991-2020 Summary Report obtained averages for the annual, seasonal and monthly number of rain days (number of days with rainfall ≥ 0.2 mm), wet days (number of days with rainfall ≥ 1 mm) and very wet days (number of days with rainfall ≥ 10 mm). Over the period 1991-2020, on an annual basis, the average number of rain days ranges from 201 days to 272 days; the average number of wet days ranges from 147 days to 226 days; and the average number of very wet days ranges from 22 days to 68 days.	Further detail on rainfall and evaporation data is provided in Section 9.3.2.1 in Chapter 9 Water.
Wind and Storms	Climate change is impacting wind patterns in the Northern European region with a range of observable effects including increased wind speeds, changes in wind direction and seasonal variations[28]. Irelands Climate Averages 1991-2020 Summary Report identifies that the annual mean hourly wind speed ranges from 9 knots at Shannon Airport to 15 knots at Malin Head. Winds are generally strongest in the northwest of the country. The strongest winds are observed during the winter months and range from 10 knots at Shannon Airport to 18 knots at Malin Head. The lightest winds are observed during the summer months and range from 8 knots at Valentia Observatory to 13 knots at Malin Head.	N/A

[26] IPCC (2021) Climate Change 2021: The Physical Science Basis <https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport.pdf>
[27] Department of Housing, Local Government and Heritage (2024) Irelands Climate Averages 1991-2020 Summary Report <https://edepositireland.ie/handle/2262/108695>
[28] IPCC (2021) Climate Change 2021: The Physical Science Basis <https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport.pdf>

Climate variable	Summary of current baseline environment	Relevant EIAR chapter (if applicable)
	In late 2023 and early 2024, Ireland experienced a very active storm season; the county was affected by 13-14 severe storms[29]. During the 2024/2025 storm season, there were 6 no. named storms, with Storm Eowyn, occurring in January 2025, reaching hurricane force winds (maximum wind speed recorded as 142km/h).[30] During the 2025/2026 storm season, there have been 3 no. named storms at the time of writing. The increased frequency and intensity of storm events will lead to associated increases in precipitation (see above). As stated in 'Air Temperature' above, the AMOC has a moderating influence on Europe, however as identified by the IPCC, the strength of the AMOC is directly correlated to global mean temperature, and as global mean temperature increases, the AMOC will weaken[31]. The weakening of this current would result in increased storm activity in Northern Europe.	

[29] *Met Éireann (2024) Human-caused Climate Change Brings Increased Storm Rainfall* <https://www.met.ie/human-caused-climate-change-brings-increased-storm-rainfall>
[30] *Met Éireann Strom Centre* https://www.met.ie/climate/storm-centre
[31] *IPCC (2019) IPCC Special Report on the Ocean and Cryosphere in a Changing Climate Chapter 6. Extremes, Abrupt Changes, and Managing Risk* <https://www.ipcc.ch/site/assets/uploads/sites/3/2022/03/08_SROCC_Ch06_FINAL.pdf>

11.3.1.3 Existing Greenhouse Gas Emissions

Greenhouse gas emissions arise from a large majority of anthropogenic activities. The main sectors which release emissions in Ireland include:

- Electricity
- Transport
- Built Environment
  - Residential
  - Commercial
- Industry
- Agriculture
- Land Use, Land Use Change, and Forestry (LULUCF)[1]
- Other (F-Gases, Waste, Petroleum refining)
- Unallocated savings

The most recent inventory report for Ireland, National Inventory Report 2025 (NIR 2025)[32], was published in 2025 and refers to the greenhouse gas inventory timeseries for the years 1990-2023. From 1990-2001, total emissions of greenhouse gases (excluding LULUCF) increased steadily from 55,231.5 ktCO_2e in 1990 to 71,476.9 ktCO_2e in 2001, which is the highest level of greenhouse gas emissions ever reported in Ireland. Emissions then plateaued until 2008 with estimates ranging from 69,032.5 ktCO_2e to 71,213.8 ktCO_2e. There was then a sharp decrease from 69,032.5 ktCO_2e in 2008 to 58,582.4 ktCO_2e in 2011. In 2023, total emissions of greenhouse gases including indirect emissions from solvent use (excluding LULUCF) in Ireland were 54,934.4ktCO_2e, which is 1.4% lower than emissions in 1990. Emissions in 2023 at 54,934.4 ktCO_2e are 6.8% lower than 2022, and the lowest level in the time series.

The Electricity sector accounted for the bulk of the CO_2 emissions in 2023 (57.1%), Agriculture contributed 36.2%, while a further 5.2% emanated from Industrial Processes and Product Use and 1.5% was due to Waste. Emissions of CO_2 accounted for 61.1% of the national total in 2023, with CH_4 and N_2O contributing 28.9% and 8.8%, respectively. The combined emissions of fluorinated gases (HFC, PFC, SF_6 and NF_3) accounted for 1.2% of total emissions in 2023[33].

11.3.2 Future Environment

Ireland is experiencing climate change in line with global trends, with current projections, detailed below, indicating that these effects will intensify in the coming decades. The baseline environment, detailed above, will undergo significant shifts, influencing Ireland's environment, economy, and society. Predicted changes include rising temperatures, altered precipitation patterns, and increased frequency of extreme weather events.

Visible changes in global climate are evident worldwide, with climate change projections suggesting further, more pronounced impacts in the future. These impacts will have wide-ranging effects on both natural and man-made environments across various sectors and regions, resulting in socio-economic repercussions. Referred to as the 'costs of inaction,' these economic impacts of climate change are increasingly influencing policy discussions[34]. It has become clear that even if greenhouse gas emissions were to cease immediately, climate alterations would persist for many decades. Therefore, alongside efforts for mitigation, it's imperative to develop effective adaptive strategies (adaptation) to mitigate damages or seize opportunities arising from climate change.

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[32] *EPA (2024) National inventory Report 2025 <https://www.epa.ie/publications/monitoring–assessment/climate-change/air-emissions/Ireland's-NID-2025.pdf>*
[33] *Ibid.*
[34] *European Environment Agency (2007) Climate change: the cost of inaction and the cost of adaptation <https://www.eea.europa.eu/publications/technical_report_2007_13/download>*

This section provides a description of the future predictions for climate change.

11.3.2.1 Data sources

A review of literature and data relating to climate change in Ireland was undertaken and utilised to provide an overview of the future baseline environment. The following key data sources were reviewed:

- High-resolution Climate Projections for Ireland – A Multimodel Ensemble Approach (report No. 339)[35]
- Climate Status Report for Ireland 2020[36]
- Climate Ireland[37]

11.3.2.2 Physical Environment

This section will describe the future baseline for the Site's physical environment under the Representative Concentration Pathways (RCP) 8.5 high emission scenario. RCPs represent climate change scenarios used in modelling the possible future climate evolution, and are based on a wide suite of assumptions, to specify the greenhouse gas concentrations that will result in defined radiative forcing by 2100. The RCP 8.5 combines assumptions about high population and relatively slow income growth with modest rates of technological change and energy intensity improvements, leading in the long term to high energy demand and greenhouse gas emissions in absence of climate change policies. Compared to the total set of RCPs, RCP 8.5 thus corresponds to the pathway with the highest greenhouse gas emissions[38]. The physical environment of the Site under the RCP 8.5 scenario is discussed under the following headers:

- Air Temperature;
- Precipitation and Flood Risk; and,
- Wind and Storms.

Air Temperature

Annual surface air temperatures[39] in Ireland are now approximately 1°C higher than they were in the early 1900's (2013 – 2022 period relative to 1903 - 1912).

The upward trend in air temperatures is predicted to continue for all seasons: annual air temperatures may increase by over 3°C by the end of the 21st century relative to a 1976 to 2005 reference period under an RCP 8.5 high emission scenario[40].

Met Éireann projections[41] indicate an increase of 1–1.6°C in mean annual temperatures in Ireland, with the largest increases seen in the east of the country. Warming is enhanced for the extremes (i.e. hot or cold days), with highest daytime temperatures projected to rise by 0.7–2.6°C in summer and lowest night-time temperatures to rise by 1.1–3°C in winter. Averaged over the whole country, the number of

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[35] *EPA Research (2020) High-resolution Climate Projections for Ireland – A Multimodel Ensemble Approach* <https://www.epa.ie/publications/research/climate-change/Research_Report_339_Part1.pdf>
[36] https://www.epa.ie/publications/research/climate-change/Research_Report_386.pdf
[37] https://www.climateireland.ie/
[38] *Climate Change (2011) A scenario of comparatively high greenhouse gas emissions* <https://link.springer.com/article/10.1007/s10584-011-0149-y>
[39] https://www.epa.ie/publications/monitoring–assessment/climate-change/irelands-climate-change-assessment-volume-1.php
[40] *Irelands Climate Change Assessment (2023) Volume 1 Climate Science – Ireland in a Changing World*
[41] https://www.met.ie/climate/climate-change#Reference3

frost days (days when the minimum temperature is less than 0°C) is projected to decrease by 62% for the RCP 8.5 high emissions scenario[42,43].

Precipitation and Flood Risk

Climate change is expected to have a significant impact on Ireland's precipitation patterns. Ireland is predicted to experience greater seasonality in precipitation, with more extreme fluctuations between wet and dry periods. Winter and autumn are anticipated to see increased rainfall, while spring and summer are projected to become drier, leading to more frequent droughts. The EPA's climate projections indicate that very wet days (i.e., days with more than 30mm of rainfall) will become more common, increasing by 31% under a high emissions scenario (RCP 8.5).

Due to Ireland's location in the west of Europe, exposure to Atlantic storms is of concern and this is particularly the case in the context of rising sea levels which will enhance the impacts of storm surges.[44]

Extreme rainfall events, such as those currently expected only once every 50 years, could become twice as frequent by the end of the century. This means more frequent flooding risks, particularly during the winter months[45]. Further information on flood risk is presented in the section below.

Flood Risk

Chapter 9 Water, and the accompanying Flood Risk Assessment (FRA) (Appendix 9-1) detail the flood risk of the Prospective Development.

The OPW Past Flood Events Maps have no records of recurring or historic flood instances within the Site. Similarly, identifiable text on local available historical 6" or 25" mapping does not identify any lands that are "liable to flood". There is one mapped historic flood event located ~4.24km to the southwest of the Wind Farm Site that is of no consequence to the Prospective Development. The GSI's Winter 2015/2016 Surface Water Flood Map shows surface water flood extents for this winter flood event. This flood event is recognised as being the largest flood event on record in many areas. The flood map for this event records 1 no. surface water flood zone within the south of the Wind Farm Site. This area has the possibility of flooding again if there is similar heavy rainfall to 2015/2016 winter. However, this flood zone is not in the vicinity of the Prospective Development. The GSI's Winter 2015/2016 Surface Water Flood Map does not record any historic flood zones along the Grid Connection Site or within the BMEP Site.

No CFRAM mapping has been completed for the area of the Wind Farm Site. The closest mapped CFRAM fluvial flood zones are along the Finn River, ~5.5km to the northeast at Stranorlar. The National Indicative Fluvial Flood Map for the Present Day Scenario maps a flood zone within the centre of the Wind Farm Site along the Bunadowen River. The flood zones from this river are constrained to be immediate vicinity of the channel. The Prospective Development avoids Flood Zones A and B with the exception of the amenity proposals. The amenity area will be constructed with porous stone, with further detail in Section 9.3.6 of Chapter 9 Hydrology and Hydrogeology of this EIAR.

The Site is not mapped within any historic or modelled groundwater flood zones. Surface water ponding/pluvial flooding may occur in some flat areas of the Wind Farm Site due to the presence of low permeability peat at the surface. Mostly the risk of pluvial flooding is low.

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[42] *Nolan, P. 2015. EPA Report: Ensemble of Regional Climate Model Projections for Ireland. EPA climate change research report no. 159. EPA: Wexford.*
[43] *O'Sullivan, J., Sweeney, C., Nolan, P. and Gleeson, E., 2015. A high-resolution, multi-model analysis of Irish temperatures for the mid-21st century. International Journal of Climatology. doi: 10.1002/joc.4419.*
[44] *https://www.epa.ie/our-services/monitoring--assessment/climate-change/climate-ireland/impact-of-climate-change-on-ireland/climate-hazards/coastal-flooding.*
[45] *EPA (2005) Climate Change Regional Climate Model Predictions for Ireland <https://www.epa.ie/publications/research/climate-change/climate-change-regional-climate-model-predictions-for-ireland-.php>*

In general, the risk of flooding at the Site is low due to the elevated and sloping nature of the land and the high density of forestry drains and natural streams which flow downslope of the Wind Farm Site, however, there are areas which may be prone to flooding, principally at watercourse crossings over the Lowerymore River along the N15. Further detail can be found in Chapter 9 Hydrology and Hydrogeology and Appendix 9-1 FRA of this EIAR.

Wind and Storms

Future climate and weather predictions indicate a slight reduction in mid-century (2041 – 2060) average wind speeds around Ireland (-2.47% for RCP 8.5 high emissions scenario compared to the 1981 – 2000 baseline), with these decreases being more pronounced during the summer months[46]. Predictions also point towards less frequent, but more intense storm activity around Ireland. Correspondingly, projections indicate a decrease in average and extreme wave heights towards the end of the century, but an increase in the frequency and severity of storm surges in coastal regions of western Ireland, particularly in winter months[47]. Storm surge levels over a 20-to-30-year return period are anticipated to increase by up to 9cm by 2100[48].

Emissions from all other sectors, including agriculture, transport, buildings, and light industry are covered by the EU Effort Sharing Regulation (ESR[49]). This established binding annual greenhouse gas emission targets for Member States for the period 2021–2030. Please see Section 11.2.1 above and Section 1.1.1.10 of Appendix 11-1 for further details on the EU ESR.

Considerable progress has been made in the decarbonisation of the Electricity Sector, with emissions falling 22% between 2022 and 2023. This reduction in emissions is due to an increase in the share of renewable electricity generation, from 38.6% to 40.7% from 2022 to 2023, with wind energy accounting for 33.7% of electricity supply.[50]

The Environmental Protection Agency (EPA) publish Ireland's greenhouse gas emission projections and at the time of writing, the most recent report, *'Ireland's Greenhouse Gas Emissions Projections 2024-2055'*[51] was published in May 2025. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the ESR.

The EPA has produced two scenarios in preparing these greenhouse gas emissions projections: a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Irelands greenhouse gas emissions in different ways. The WEM scenario assumes no additional policies and measures, beyond those already in place by the end of 2023. This is the cut off point for which the latest national greenhouse gas emission inventory data is available. The WAM scenario has a higher level of ambition and includes government policies and measures to reduce emissions such as those in Ireland's Climate Action Plan 2024 that are not yet implemented. As implementation of policies and measures occurs, they will be migrated into the WEM Scenario. Please note, CAP25 is not specifically referenced in this report as it had yet to be published during the preparation phase of the 2024-2055 projections. A review was undertaken and there are no significant additional measures in CAP25 therefore no major omissions in these projections.

The EPA Emission Projections Update notes the following key trends:

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[46] https://www.climateireland.ie/impact-on-ireland/future-climate-of-ireland/windspeed/
[47] https://www.epa.ie/publications/research/climate-change/research-339-high-resolution-climate-projections-for-ireland-.php
[48] https://www.climateireland.ie/impact-on-ireland/future-climate-of-ireland/waves–surges/
[49] Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris There was a significant drop in emissions from the Energy Industries sector between 2022 and 2023 (down 2.1 Mt CO2eq or 21.4%). This reduction in emissions was partly due to a 12-fold increase in the amount of imported electricity (9.5% of electricity supply in 2023), in combination with an increase in the share of renewable energy from 38.6% in 2022 to 40.7% in 202Agreement and amending Regulation (EU) No 525/2013 (Text with EEA relevance)
[50] Department of the Environment, Climate and Communications (2025) - Climate Action Plan 2025
[51] EPA (2025) Ireland's Greenhouse Gas Emissions Projections 2024-2055

- Ireland is not on track to meet the 51% emissions reduction target by 2030 (as compared to 2018 levels) which include many 2024 Climate Action Plan measures. Greenhouse gas emissions are projected to be 9 - 23% lower by 2030 (compared to 2018) which places Ireland further from the 2030 national climate target compared to previous assessments.
- Ireland is not projected to meet its EU target, set under the Effort Sharing Regulation, of a 42% emissions reduction by 2030 (compared to 2005) even with flexibilities applied. This assessment shows that greenhouse gas emissions will be reduced by 10 - 22% by 2030 (compared to 2005) without the use of flexibilities and by 13 – 26% with the use of flexibilities.
- Budget period 1 (2021-2025) of 295 Mt CO2eq is projected to be exceeded by between 8 to 12 Mt CO2eq. Budget period 2 (2026-2030) of 200 Mt CO2eq is also expected to be exceeded by a significant margin of 77 to 114 Mt CO2eq (with carryover from Budget period 1).
- Sectoral emissions ceilings for 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport sectors; and met by the sector 'Other'. A direct comparison of emissions in the Agriculture sector against its Sectoral Emission Ceilings is no longer viable due to significant refinement of the Agriculture inventory.
    - Emissions from the Residential Sector are projected to decrease from 7.0 Mt CO2eq in 2018 to between 5.7 and 5.4 Mt CO2eq in 2030 (a 19 – 22% reduction). 571,000 domestic heat pumps are projected to be installed by 2030.
    - Transport emissions are projected to decrease from 12.3 Mt CO2eq in 2018 to between 9.7 Mt CO2eq and 11.2 Mt CO2eq in 2030 (a 9 - 21% reduction).
    - Emissions from the LULUCF sector are projected to increase over the period 2018 to 2030 by between 1.5 and 3.8 Mt CO2eq (an increase of 39 – 95%).
- From 10.6 Mt CO2eq in 2018, emissions from the Energy Industries sector are projected to decrease to between 3.4 and 4.4 Mt CO2eq in 2030 (a 59 – 68% reduction).
    - Renewable energy generation at the end of the decade is projected to range from 60 – 68% of electricity generation as a result of a projected rapid expansion in wind energy and other renewables.
- From 21.4 Mt CO2eq in 2018, emissions from the agriculture sector are projected to be between 18.0 and 21.6 Mt CO2eq in 2030 (a 16% reduction in WAM and 1% increase in WEM).
- The ten PaMs (WEM and WAM) estimated to achieve the largest potential GHG emission reductions in 2030 account for over three quarters of the total potential GHG emission reduction in 2030.

11.3.3 Summary

As outlined in the preceding sections, Ireland is and will continue to experience climate change in line with global trends, with current projections indicating that these effects will intensify in the coming decades. The design of the Meenbog Wind Farm considered the potential climate change effects under both the baseline and future environment, and it is considered that the Prospective Development will not be negatively impacted by climate change, nor will it have a negative impact on climate change over its 25-year operational horizon.

Further information on the vulnerability of the Prospective Development to major accidents and natural disasters is detailed in Chapter 16 Major Accidents and Natural Disasters.

11.4 Calculating Carbon Losses and Savings from the Prospective Development

11.4.1 Background

In addition to the combustion of fossil fuels, greenhouse gases are also released through natural processes such as the decomposition of organic material (which is composed of carbon). Bogs and peatlands are known to store large amounts of carbon. Due to the waterlogged nature of these habitats, stored carbon is not broken down and released into the atmosphere. The construction of wind farms on bog and peat habitats may affect the natural hydrological regime, thus exposing and drying out the peat and allowing the decomposition of carbon. It is therefore necessary to demonstrate that any wind farm constructed on such sites saves more carbon than is released. The Prospective Development is situated on coniferous forestry, agricultural land, heath and areas of peatland. For this reason, the carbon balance between the use of renewable energy and the loss of carbon stored in the peat will be assessed in this section of the EIAR. Note, in line with the Forest Service's published policy[52] on granting felling licences for wind farm developments, areas cleared of forestry for access roads, and any other wind farm-related uses will be replaced by replanting at an alternative site or sites. The Forest Service policy requires replacement or replanting on a hectare for hectare basis for the footprint of the infrastructure developments.

CO_2 emissions occur naturally in addition to being released with the burning of fossil fuels. All organic material is composed of carbon, which is released as CO_2 when the material decomposes. Organic material acts as a store of carbon. Peatland habitats have a significant capacity to store organic carbon. The vegetation on a peat bog slowly absorbs CO_2 from the atmosphere when it is alive and converts it to organic carbon. When the vegetation dies, in the acidic waterlogged conditions of bogs and peatlands, the organic material does not decompose fully, and the organic carbon is retained in the ground.

The carbon balance of wind farm developments in peatland habitats has attracted significant attention in recent years. When developments such as wind farms are proposed for peatland areas, there will be direct impacts and loss of peat in the area of the development footprint. There may also be indirect impacts where it is necessary to install drainage in certain areas to facilitate construction, or from the reinstatement of extracted peat. The works can either directly or indirectly allow the peat to dry out, locally, which permits the full decomposition of the stored organic material with the associated release of the stored carbon as CO_2. It is essential therefore that any wind farm development in a peatland area saves more CO_2 than is released.

The below assessment includes all carbon losses associated with turbine infrastructure lifecycle (manufacture, construction, decommissioning) of the Prospective Development, back up of turbines, reduced carbon fixing potential of the Site, soil organic matter, tree felling activities, traffic generation, embodied carbon of all construction materials, and those emissions associated with carbon savings from the Prospective Development.

11.4.2 Methodology for Calculating Losses

A methodology was published in June 2008 by scientists at the University of Aberdeen and the Macauley Institute with support from the Rural and Environment Research and Analysis Directorate of the Scottish Government, Science Policy and Co-ordination Division. The document, '*Calculating Carbon Savings from Wind Farms on Scottish Peat Lands*', was developed to calculate the impact of wind farm developments on the soil carbon stocks held in peat. This methodology was refined and updated in 2011 based on feedback from users of the initial methodology and further research in the area. The web-based version of the carbon calculator, which supersedes the excel based versions of the tool, was released in 2016. Please note, the web-based version of the carbon calculator is currently not available, the Macauley Institute has supplied a worksheet of the calculator (Version 2.14.0) which has

[52] *Department of Agriculture, Food, and the Marine, Tree Felling and Reforestation Policy* <https://www.gov.ie/en/publication/19b8d-tree-felling-licences/>

been used to complete the following carbon loss assessment. The tool provides a transparent and easy to follow method for estimating the impacts of wind farms on the carbon dynamics of peatlands. Previously guidance produced by Scottish Natural Heritage in 2003 had been widely employed to determine carbon payback in the absence of any more detailed methods.

Although the loss of carbon fixing potential from plants on peat land is not substantial, it is nonetheless calculated for areas from which peat is extracted and the areas affected by drainage. The development of a wind farm requires the construction of infrastructure, i.e., turbines and associated foundations and hardstands, internal site roads, construction compounds, etc. and, this requires peat excavation resulting in the loss of the carbon-fixing potential associated with peat. The determination of the carbon losses associated with the carbon-fixing potential of peat is calculated from the area affected by proposed infrastructure (both directly by removal of peat and indirectly by drainage, the annual gains due to the carbon fixing potential of the peatland, and the time required for habitat restoration). The amount of carbon lost is estimated by the Macauley Institute carbon tool using default values from the IPCC Revised 1996 Guidelines for National Greenhouse Gas Inventories[53], as well as by more site-specific equations derived from the scientific literature and updated emission factors. [54] Please note, carbon losses associated with the removal of other carbon-fixing vegetation will result in additional carbon losses. These have not been quantified as the lack of consistent national-level field data and methodologies limits the ability to make accurate projections on carbon sequestration potential for other carbon fixing habitat types, i.e., hedgerow, grassland, etc., and therefore carbon loss associated with removal. While it can be assumed that loss of carbon fixing vegetation will occur as part of the Prospective Development due to the removal of these habitat types, the exact carbon loss is not quantifiable. However, to ensure a robust assessment in Section 11.5 these carbon losses have been considered; please see Section 11.5.2 and 11.5.3 below for the detailed impact assessment and Appendix 11-2 for further information on assumptions used in this assessment.

Peatlands are essentially unbalanced systems. When flooded, peat soils emit less carbon dioxide but more methane than when drained. In waterlogged soils, carbon dioxide emissions are usually exceeded by plant fixation, so the net exchange of carbon with the atmosphere is negative and soil carbon stocks increase. When soils are aerated, carbon emissions usually exceed plant fixation, so the net exchange of carbon with the atmosphere is positive. In order to calculate the carbon emissions resulting from the removal or drainage of the peat, the Macauley Institute method accounts for emissions occurring if the peat had been left in-situ and subtracts these from the emissions occurring after removal and drainage.

The Macauley Institute methodology states that the total volume of peat impacted by the construction of the wind farm is strongly correlated to the extent of the peatland affected by drainage at the Wind Farm Site.

The drainage of peat soils leads to continual loss of soil carbon until a new steady state is reached, when inputs are approximately equal to losses. For peats, this steady state approximates 0% carbon, so 100% carbon loss from drained peats is assumed if the Wind Farm Site is not restored after decommissioning of the wind farm. The amount of carbon lost is calculated on the basis of the annual emissions of methane and carbon dioxide, the area of drained peat, and the time until the Wind Farm Site is restored. In the case of the Prospective Development, the model has been prepared on the basis that restoration will not occur upon decommissioning (i.e., site roads and hardstands will be left in situ). However, as detailed in Section 4.12 of Chapter 4 Description of the Prospective Development of the EIAR, upon decommissioning, all above ground turbine and met mast components will be removed, and foundations and compounds would remain underground and covered with earth and allowed to revegetate. The Decommissioning Plan, included as Appendix 4-6, will be updated prior to the end of

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[53] *IPCC (1997) Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories*

[54] *Calculating potential carbon losses and savings from wind farms on Scottish peatlands (2018) < https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2018/12/carbon-calculator-technical-guidance/documents/calculating-potential-carbon-losses-and-savings-from-wind-farms-on-scottish-peatlands-technical-guidance/calculating-potential-carbon-losses-and-savings-from-wind-farms-on-scottish-peatlands-technical-guidance/.pdf*

the operational period in line with decommissioning methodologies that may exist at the time and will be agreed with the competent authority at that time.

The effects of drainage may also reduce dissolved and particulate organic carbon retention within the peat. Losses of carbon dioxide due to leaching of dissolved and particulate organic carbon are calculated as a proportion of the gaseous losses of carbon from the peat. The Macauley Institute method assumes that published good practice is employed in relation to avoiding the risk of peat landslides. As detailed in Chapter 8 of this EIAR Land Soils and Geology, the Prospective Development has been the subject of a peat stability risk assessment; further details are contained within Appendix 8-1 of this EIAR.

Tree felling will be required within and around the Prospective Development infrastructure footprint to allow for the completion of construction of the proposed turbines, access roads, underground cabling, and the other ancillary infrastructure. Forestry may be felled earlier than originally planned due to the Prospective Development, so limiting the nature and longevity of the resulting timber produced. If a forestry plantation was due to be felled with no plan to replant, the effect of the land use change is not attributable to the wind farm development and is omitted from the calculation. If, however, the forestry is felled for the development, as is the case for the Prospective Development, the effects are judged to be attributable to the wind farm development. Carbon losses as a result of felling are calculated from the area to be felled, the average carbon sequestered annually, and the lifetime of the wind farm. Alterations in soil carbon levels following felling are calculated using the equations for drainage and site restoration already described.

The outputs of the Macauley Institute web-based carbon calculator are included in Appendix 11-2 of this EIAR, '*Carbon Calculations'*.

In addition to the Macauley Institute methodology described above, where possible, carbon emissions or losses associated with embodied carbon of materials used in the construction, operational and decommissioning phase of the Prospective Development have been identified. Embodied carbon refers to the emissions associated with procuring, mining, and harvesting raw materials, the transformation of those materials into construction products, transporting them to the Wind Farm Site, installation of these materials during a construction phase, and the subsequent replacement, removal, and disposal of these materials upon decommissioning.[55]

The full life cycle and embodied carbon of the Prospective Development turbines have been taken account of in the Macauley Institute model. The emissions associated with the embodied carbon, along with the construction phase transport movements, of the remaining features of the Prospective Development are considered using the Transport Infrastructure Ireland (TII) Carbon Tool (TII 2022)[56]. The TII Carbon Tool is customised for road and light rail projects in Ireland, using emission factors from recognised sources during the construction, maintenance and operation of TII projects in Ireland.

Section 15.1 in Chapter 15 of this EIAR outlines traffic generation numbers relative to quantum of materials required for the construction of the Prospective Development, the details of which have been utilised to determine the emissions associated with these activities and are included in Appendix 11-2 '*Carbon Calculations*'.

[55] *Irish green Building Council – What is embodied carbon?* <https://www.igbc.ie/what-is-embodied-carbon/>
[56] *Transport Infrastructure Ireland Carbon Tool for Road and Light Rail Projects: User Guidance Document* https://www.tiipublications.ie/library/GE-ENV-01106-01.pdf

11.4.3 Carbon Losses and Savings Calculations

11.4.3.1 Carbon Losses – Prospective Development

The Scottish Government online carbon calculator was used to assess the impacts of the Prospective Development in terms of potential carbon losses taking into account drainage, habitat improvement, forestry felling and site restoration. The online calculator is pre-loaded with information specific to the CO_2 emissions from the United Kingdom's electricity generation plant, which is used to calculate emissions savings from proposed wind farm projects in the UK. However, due to the availability of Irish specific carbon intensity emission factors for the Irish electricity generation plant, the CO_2 emissions savings from the Prospective Development have been calculated separately from the online carbon calculator as set out in Section 11.4.3.2 below.

In relation to embodied carbon and associated transport movements of all other ancillary elements of the Prospective Development, the TII Carbon Tool has been utilised to assess the impacts of the Prospective Development in terms of potential carbon losses in regards to construction phase transport emissions and embodied carbon.

A copy of the outputs is provided as Appendix 11-2 of this EIAR. Where available and relevant, site-specific information was inserted into the online carbon calculators. Otherwise, default values were used.

The main CO_2 losses due to the Prospective Development are summarised in Table 11-6.

Table 11-6 CO_2 Losses from the Prospective Development

Origin of Losses	CO_2 Losses (tonnes CO_2 equivalent)	
	Expected	Maximum
Losses due to turbine life (e.g., manufacture, construction, decommissioning)	76,329	76,329
Losses due to backup	43,641	43,641
Losses from reduced carbon fixing potential	439	1,793
Losses from soil organic matter and due to leaching of dissolved and particulate organic carbon (CO_2 loss from removed)	21,999	348,442
Losses associated with pre-construction activities (tree felling, peatland excavation)	162	162
Losses associated with construction activities	73	73
Losses associated with embodied carbon in construction materials	2,164	2,164
Losses associated with traffic and transport movements	122	122
Total	144,929	472,726

The worksheet models and online tools calculate that the Prospective Development will give rise to 144,929 tonnes of CO_2 equivalent losses over its 25-year life. Of this total figure, the proposed turbines directly account for 76,329 tonnes, or 52.7%. Losses due to backup account for 43,641 tonnes, or 30.1%. Losses from reduced carbon fixing potential accounts for 0.3% or 439 tonnes. Losses from soil organic matter, i.e., CO_2 loss from disturbed soil and subsoils, will equate to 21,999 tonnes, or 15.2%. Losses due to pre construction activities account for 162 tonnes or 0.1%, while losses due to construction activities account for 73 tonnes or 0.1%. Losses due to embodied carbon accounts for 2,164 tonnes or 1.5% and losses due to construction phase transport emissions accounts for 0.1% or 122 tonnes.

The figure of 439 tonnes of CO_2 arising from ground activities associated with the Prospective Development/ is calculated based on the entire Prospective Development footprint being in "Acid Bog", as this is one of only two choices the model allows (the other being Fen). The habitat that will be impacted by the development footprint comprises a mix of peatland and coniferous forestry rather than acid bog, as assumed by the model. The value of 439 tonnes of CO_2 arising from ground activities in 'Acid Bog' is under a precautionary scenario, and therefore the actual CO_2 losses are expected to be lower than this value.

The values discussed above are based on the assumption that no habitat enhancement or afforestation activities will take place as part of the Prospective Development. As detailed in Section 4.4.1.9 of this EIAR, the estimated 9 hectares (ha) of forestry that will be permanently felled for the footprint of the Wind Farm Site infrastructure will be replaced or replanted on a hectare for hectare basis as a condition of any felling licence that will be issued in respect of the Prospective Development. As detailed in Appendix 6-4, a Biodiversity Management and Enhancement Plan (BMEP) for the Prospective Development has identified enhancement activities such as the creation of hen harrier habitat and peatland habitat. A derogation will be sought in relation to the felling requirements at the BMEP Site, and if obtained, no replanting will be required for the felling that is undertaken. In the event that this derogation is not obtained, the replanting obligation for the felling undertaken at the BMEP Site be replanted on a hectare for hectare basis outside the hydrological catchment within which the Prospective Development is located.

The figure of 2,641 tonnes of CO_2 arising from the embodied carbon of construction materials associated with the Prospective Development is calculated based the types of materials available in the TII Carbon tool such as, concrete, steel, cement and granular fill, and assumes that each HGV or LGV will be carrying material at its full capacity. The figure of 122 tonnes of CO_2 arising from transport movements associated with construction activities of the Prospective Development is calculated based on the assumption that material will be imported locally or from a port/city location where applicable. Details on the assumptions made for the modelling of embodied carbon and construction phase transport emissions are included in Appendix 11-2 of this EIAR.

The figure of 162 tonnes of CO_2 associated with pre-construction activities is based on the 121.5ha of tree felling proposed to be removed as part of the Prospective Development, and general excavation activities within peatland to be undertaken throughout the Prospective Development. As outlined in Section 11.4.1 above, replanting has not been included due to fact that the carbon storage capacity of restored habitats will vary over time as vegetation matures and land use and the baseline environment change. To ensure this assessment is completed under a theoretical precautionary scenario the quantification of these potential carbon savings (via an increase in carbon storage potential) associated with replanting has not been included.

The figure of 73 tonnes of CO_2 arising from construction activities is associated with the volume of material proposed to be won from the Prospective Development and utilised within the Wind Farm Site. As identified in Section 4.4.1.4.4 of Chapter 4 of this EIAR, approximately 70,000m^3 of rock is proposed to be won on the Wind Farm Site for use. The use of the 70,000m^3 of rock has therefore been utilised to inform Table 11-6 above.

The values discussed above are based on the assumption that the hydrology of the Prospective Development and habitats within the Wind Farm Site are not restored on decommissioning of the

Meenbog Wind Farm after its expected 25-year proposed operational life. As detailed in the Decommissioning Plan, Appendix 4-6, the wind turbines and met mast will be dismantled and removed offsite. It is not intended to remove the concrete foundations from the ground as it is considered that its removal will be the least preferred options in terms of having potential effects on the environment. The associated foundations that protrude above ground level will be covered over with soil - reinforced concrete foundations remaining in-situ. The underground electrical cabling connecting the turbines to the on-site substation will be removed from the cable ducts. The cable ducting will be left in-situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance. The cable materials will be transferred to a suitable recycling or recovery facility. Taking into account the proposals incorporated in the Decommissioning Plan, the actual CO_2 losses are expected to be lower than the values detailed in Table 11-6.

11.4.3.2 Carbon Savings – Prospective Development

According to the model described above, the Prospective Development will give rise to total losses of 144,929 tonnes of carbon dioxide.

A simple formula can be used to calculate carbon dioxide emissions reductions resulting from the generation of electricity from wind power rather than from carbon-based fuels such as peat, coal, gas and oil. The formula is:

$$CO_2 \text{ (in tonnes)} = \frac{(A \times B \times C \times D)}{1000}$$

where: A = ... The rated capacity of the wind energy development in MW

B = ... The capacity or load factor, which takes into account the intermittent nature of the wind, the availability of wind turbines and array losses etc.

C = ... The number of hours in a year

D = ... Carbon load in grams per kWh (kilowatt hour) of electricity generated and distributed via the national grid.

For the purposes of this calculation, the rated capacity of the Prospective Development is assumed to be 91.2 MW (based on 19 no. 4.8 MW turbines).

A capacity factor of 0.33 (or 33%) has been used for the Prospective Development.[57]

The number of hours in a year is 8,760.

A conservative figure for the carbon load of electricity generated by natural gas in Ireland was sourced from Sustainable Energy Authority Ireland's (SEAI) Conversion and Emissions Factors for Publication worksheet.[58] The emission factor for electricity generated in Ireland in 2024 was 201.4 gCO_2/kWh.[59]

The calculation for carbon savings is therefore as follows:

$$CO_2 \text{ (in tonnes)} = \underline{(91.2 \times 0.33 \times 8{,}760 \times 201.4)}$$

[57] *EirGrid, 2025 Enduring Connection Policy 2.4 Solar and Wind Constraints Report: Assumptions and Methodology. Available at: https://cms.eirgrid.ie/sites/default/files/publications/ECP-2.4-Solar-and-Wind-Constraints-Report-Assumptions-and-Methodology-v1.1.pdf The Prospective Development is located within the A wind region for Ireland with an associated capacity factor of 33%.*
[58] *Conversion and Emission Factors for Publication (2023) https://www.seai.ie/data-and-insights/seai-statistics/conversion-factors/SEAI-conversion-and-emission-factors.xlsx*
[59] *SEAI have published the provisional 2024 emission factor for electricity generation in Ireland as 201.4 gCO2/kWh. Please note that this is a provisional value that may change.*

1000

= 53,097 tonnes per annum

Based on this calculation, **53,097** tonnes of carbon dioxide will be displaced per annum from the largely carbon-based traditional energy mix by the Prospective Development. Over the proposed 25-year lifetime of the development, therefore **1,327,425** tonnes of carbon dioxide will be displaced from traditional carbon-based electricity generation.

Based on the Scottish Government carbon calculator as presented above in Section 11.4.3.1, approximately 144,929 tonnes of CO_2 will be lost to the atmosphere due to changes in the soil and ground conditions and due to the construction and operation of the Prospective Development. This represents **11%** of the total amount of carbon dioxide emissions that will be offset by the Prospective Development. The 144,929 tonnes of CO_2 that will be lost to the atmosphere due to changes in soil and ground conditions and due to the construction and operation of the Prospective Development will be offset by the Prospective Development in approximately **33** months (2.75 years) of operation.

As detailed in Section 11.4.3.1 above, habitat enhancement and afforestation activities will take place as part of the Prospective Development. As detailed in Section 4.4.1.9 of this EIAR, the estimated 9 ha of forestry that will be permanently felled for the footprint of the Wind Farm Site infrastructure will be replaced or replanted on a hectare for hectare basis as a condition of any felling licence that will be issued in respect of the Prospective Development. Similarly, as detailed in Appendix 6-4, a BMEP for the Prospective Development has identified enhancement activities which includes forestry felling of approximately 108 ha and the enhancement of approximately 6.2 ha of peatland habitat. These activities, over the lifetime of the Prospective Development have the potential to give rise to carbon savings; please note, this potential has not been quantified but is considered in Section 11.5.3 below. The carbon storage capacity of restored habitats will vary over time as vegetation matures and land use and the baseline environment change. Therefore, while it can be assumed that the on the Site will result in an increased capacity of carbon storage due to the carbon storage potential that exists within these habitats[60], to ensure the assessment below is identified under a theoretical precautionary scenario the quantification of these potential carbon savings (via an increase in carbon storage potential) associated with these measures has not been included in the below assessment outside of an assumed offset potential (Section 11.5.3 below).

11.5 Likely Significant Effects and Associated Mitigation Measures

11.5.1 'Do-Nothing' Effect

If the Prospective Development were not to proceed, the Site will continue to function as it does at present, with no changes to the current land-use.

If the Prospective Development were not to proceed, the opportunity to complete the Meenbog Wind Farm, which will further significantly reduce emissions of greenhouse gases, including carbon dioxide (CO_2), oxides of nitrogen (NO_x), and sulphur dioxide (SO_2) from fossil fuels to the atmosphere would be lost. The opportunity to contribute to Ireland's commitments under the Kyoto Protocol, the Paris Agreement, and EU law would also be lost. This would be a long-term moderate negative effect and is not significant.

[60] https://teagasc.ie/news–events/daily/carbon-stocks-and-sequestration-in-hedgerows/

11.5.2 Construction Phase

11.5.2.1 Greenhouse Gas Emissions

Pre-Mitigation impact

Prospective Development

The completion of construction of turbines and associated foundations and hard-standing areas, meteorological mast, access roads, temporary construction compounds, underground cabling, borrow pits, peat and spoil management areas, biodiversity enhancement areas, site drainage and all ancillary works and apparatus, will require construction materials (such as cement), and the operation of construction vehicles and plant on and off-site, and the transport of workers to and from the Wind Farm Site. Greenhouse gas emissions, e.g., carbon dioxide (CO_2), carbon monoxide and nitrogen oxides, associated with the production of construction materials, and operation of vehicles and plant will arise as a result of the construction activities. This effect will be short-term and slight only, given the quantity of greenhouse gases that will be emitted to the atmosphere and will be restricted to the duration of the construction phase. Mitigation measures to reduce this effect are presented below.

Some potential long-term imperceptible negative effects will occur due to the removal of carbon fixing vegetation and habitat, however, that has been avoided where possible by the design and layout of the Wind Farm Site. This effect will be long-term, negative and imperceptible only, given the quantity of greenhouse gases that will be emitted to the atmosphere and is not significant.

Transport to Site

The transport of turbines and construction materials to the Wind Farm Site, which will occur on specified routes only (see Section 4.6.3 in Chapter 4 of this EIAR), will also give rise to greenhouse gas emissions associated with the transport vehicles and exhaust emissions. This impact will be short-term and imperceptible only, given the quantity of greenhouse gases that will be emitted and will be restricted to the duration of the construction phase, therefore it is not significant. Mitigation measures to reduce this effect are presented below.

Waste Disposal

Construction waste will arise from the construction of the Prospective Development, mainly from excavation and unavoidable construction waste including material surpluses, damaged materials and packaging waste. This potential impact will be short-term and slight only, given the quantity of greenhouse gases associated with the generation and management of these waste streams that will be emitted to the atmosphere and will be restricted to the duration of the construction phase, therefore it is not significant. Waste management will be carried out in accordance with '*Best Practice Guidelines on the Preparation of Resource and Waste Management Plans for Construction & Demolition Projects*' (2021) produced by the EPA.

Please refer to Section 4.7.7 of Chapter 4 of this EIAR and Section 3.8 of the Construction and Environmental Management Plan (CEMP) for detailed processes on waste management during the construction phase of the Prospective Development.

Mitigation

- Construction staff will be trained how to inspect and maintain construction vehicles and plant to ensure good operational order while onsite, thereby minimising any emissions that arise. The Site Supervisor/Construction Manager produce and follow a

site inspection and machinery checklist which will be followed and updated if/when required.
- All construction vehicles and plant will be maintained in good operational order while onsite, thereby minimising any emissions that arise.
- When stationary, delivery and on-site vehicles will be required to turn off engines.
- Turbines and construction materials will be transported to the site on specified routes only unless otherwise agreed with the Planning Authority. Please see Chapter 15 Material Assets for details.
- It is intended to obtain the materials for the construction of the Prospective Development from the onsite borrow pits.
- Areas of excavation will be kept to a minimum, placement of material will be in designated peat and spoil management areas (i.e. the onsite borrow pits, and peat cell at T18).
- A Construction and Environmental Management Plan (CEMP) (Appendix 4-3) will be in place throughout the construction phase.
- The CEMP (Appendix 4-3) includes a Waste Management Plant (WMP) which outlines the best practice procedures that will occur during the construction phase relating to waste material.
    - The WMP outlines the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of construction of the Prospective Development. Disposal of waste will be seen as a last resort.
    - Section 4.5.7 of Chapter 4 for this EIAR refers to the methodology that will be utilised to manage onsite waste. This waste material will be transferred to a licensed /permitted Materials Recovery Facility (MRF) by a fully licensed waste contractor,
    - The MRF facility will be local to the Wind Farm Site to reduce the amount of emissions associated with vehicle movements.
- It is intended to obtain the majority of aggregate materials for the construction of the Prospective Development from the onsite borrow pits (with some material being imported from local licenced quarries as needed). This will significantly reduce the number of delivery vehicles accessing the Site, thereby reducing the amount of emissions associated with vehicle movements.
- Where applicable, low carbon intensive construction materials will be sourced and utilised onsite.

Residual Effects

Following implementation of the mitigation measures above, residual effects of greenhouse gas emissions arising from the construction phase of the Prospective Development will have a short-term imperceptible negative effect and is not significant. However, once emitted to the atmosphere, the greenhouse gas emissions that will arise from construction phase activities will have a permanent imperceptible negative effect on Climate, which is not significant.

When considering these greenhouse gas emissions within the context of the national Electricity Sector Emissions Ceilings detailed in Section 11.2.2, Carbon Budget 1 (2021-2025) has an Electricity Sector budget of 40 MtCO2eq. and Carbon Budget 2 (2026-2030) has an Electricity Sector budget of 20 MtCO2eq for large-scale deployment of renewables. As detailed in Section 11.4.3.3, the Prospective Development will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 25-year lifespan. Therefore, while there will be greenhouse gas emissions associated with the construction of the Prospective Development, this will take place under the Electricity sector emissions ceiling and will be offset by the operation of the Meenbog Wind Farm over its operational life.

Significance of Effects

Based on the assessment above there will be no significant effects.

11.5.3 Operational Phase

11.5.3.1 Greenhouse Gas Emissions

Identification of Effect

Prospective Development

The Prospective Development will generate energy from a renewable source. As detailed in Section 11.4.3.2 above, the Prospective Development will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 25-year lifespan of the Meenbog Wind Farm. For the purposes of this EIAR, a rated output of 4.8MW per turbine has been chosen to calculate the anticipated power output of the proposed turbines, which would result in an estimated output of 91.2MW, displacing approximately 53,097 tonnes of carbon dioxide per annum from traditional carbon-based electricity generation. This will have a long-term moderate positive impact on climate.

The operational phase of the Wind Farm Site will generate additional traffic to the area in the form of light goods vehicles (LGVs) visiting the site 1-2 times per day for maintenance and monitoring activities but on occasion, daily visits by LGVs and HGVs may be required over short periods during maintenance/component replacement activities, and less than this from the Grid Connection Site and BMEP. The addition of 1-2 HGVs per week on occasion over the 25-year lifetime of the Prospective Development will give rise to a long-term imperceptible negative effect on climate which is not significant.

Additional potential long-term not significant negative impacts that may occur during the operational phase of the Prospective Development are the release of carbon dioxide to the atmosphere due to maintenance and monitoring activities and the removal of carbon fixing vegetation and habitat, as well as associated drainage. With respect to transport volumes, there will only be an average of approximately 1 to 2 trips made to the Wind Farm Site by car or light goods vehicle per day.

Transport to and from the Site

In the unlikely event that a turbine blade is damaged and must be replaced during the operational phase, the impacts described in Section 11.5.2.1 will be the same. Emissions resulting from routine maintenance at the Prospective Development are included in the '*Prospective Development'* section above.

Waste Disposal

Waste is not proposed to be generated on the site during the operational phase, any waste that does arise will be minimal and any impact will be short-term and imperceptible. Waste management will be carried out in accordance with '*Best Practice Guidelines on the Preparation of Resource and Waste Management Plans for Construction & Demolition Projects'* (2021) produced by the EPA.

Mitigation

- Ensure that all maintenance and monitoring vehicles will be maintained in good operational order while onsite, and, when stationary, be required to turn off engines thereby minimising any emissions that arise.

Residual Effect

Following implementation of the mitigation measures above, residual effects of greenhouse gas emissions arising from the operational phase of the Prospective Development will have potential long-term, imperceptible, negative, not significant effect on Climate.

Please note, as identified above in Section 11.4.3.2, the carbon storage capacity of restored habitats will vary over time as vegetation matures and land use and the baseline environment change. Therefore, while it can be assumed that measures outlined in the BMEP and 18.9ha of afforestation that will occur as part of the Prospective Development will result in an increased capacity of carbon storage due to the carbon storage potential that exists within these habitats[61], to ensure this assessment is completed under a theoretical precautionary scenario, the quantification of these potential carbon savings (via an increase in carbon storage potential) associated with these measures has not been included.

The operation of the Prospective Development will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 25-year operational lifespan due to the provision of clean, renewable energy to the national grid. Therefore, while there will be greenhouse gas emissions associated with the operation of the Prospective Development, this will be offset by the operation of the Subject Development over its 25-year operational life.

This will have a Long-term Moderate Positive Effect on Climate as a result of reduced greenhouse gas emissions and not significant.

Significance of Effects

Based on the assessment above there will be no significant effects.

11.5.4 Decommissioning Phase

The wind turbines proposed as part of the Prospective Development are expected to have a operational period of 25-years. Following the end of this period, the operational period may be extended, or the equipment may be replaced with a new technology, subject to planning permission being obtained, or the Wind Farm Site may be decommissioned.

Upon decommissioning of the Meenbog Wind Farm, the wind turbines and the meteorological mast will be disassembled in reverse order to how they were erected. All above ground turbine and mast components would be separated and removed off-site for recycling. Turbine and met mast foundations would remain underground and would be covered with earth and allowed to revegetate. Leaving the foundations in-situ is considered a more environmentally prudent option, as to remove that volume of reinforced concrete from the ground could result in significant temporary environment nuisances such as noise, dust and/or vibration. Site roadways will be used during the operational phase by forestry machinery and therefore will be retained post decommissioning to continue to facilitate these activities.

The underground electrical cabling connecting the proposed turbines to the onsite 110kV substation will be removed from the cable ducts. The cabling will be pulled from the cable ducts using a mechanical winch which will extract the cable and re-roll it on to a cable drum. This will be undertaken at the original cable jointing pits which will be excavated using a mechanical excavator and will be fully re-instated once the cables are removed. The cable ducting will be left in-situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance. The cable materials will be transferred to a suitable recycling or recovery facility.

[61] https://teagasc.ie/news–events/daily/carbon-stocks-and-sequestration-in-hedgerows/

The Grid Connection and the onsite 110kV substation will remain in place as they will be part of the Electricity Grid under the ownership and control of ESB Networks/ EirGrid.

Any impact and consequential effect that occurs during the decommissioning phase are similar to that which occur during the construction phase, be it of less impact. The mitigation measures prescribed for the construction phase of the Prospective Development will be implemented during the decommissioning phase thereby minimising any potential impacts.

A Decommissioning Plan has been prepared (Appendix 4-6). The Decommissioning Plan will be updated prior to the end of the operational period in line with decommissioning methodologies that may exist at the time and will agree with the competent authority at that time. The potential for effects during the decommissioning phase of the Wind Farm Site has been fully assessed in the EIAR.

11.6 Cumulative Effects – Prospective Development

The potential for impact between the Prospective Development, and other relevant developments has been carried out with the purpose of identifying what influence the Prospective Development will have on the surrounding environment when considered cumulatively and in combination with relevant existing permitted or proposed projects and plans in the vicinity of the Site, such as other wind energy developments, extractive industries, battery energy storage systems, forestry etc. Please see Section 2.10 of Chapter 2 for the cumulative assessment methodology used.

During the construction phase of the Prospective Development and the construction of other permitted or proposed projects and plans. in the area (please see Section 2.10 in Chapter 2 and Appendix 2-1 of this EIAR), there will be emissions from construction plant and machinery associated with the construction activities. However, once the mitigation proposals, as outlined in the above assessment are implemented during the construction phase of the Prospective Development, there will be no cumulative negative effect on Climate.

Exhaust emissions during the operational phase of the Prospective Development will be minimal, relating to the use of maintenance vehicles onsite, and therefore there will be no measurable negative cumulative effect with other developments on Climate.

The nature of the Prospective Development is such that, once operational, it will have a long-term, moderate, positive impact on the climate. When considered cumulatively with other renewable energy projects, this will have a long-term, significant, positive impact on Climate There will be no measurable negative cumulative effect with other developments on Climate.

11.6.1 Construction Phase

During the construction phase of the Prospective Development and other permitted or proposed projects and plans in the area as set out in Section 2.10 in Chapter 2 of this EIAR, that are yet to be constructed, there will be greenhouse gas emissions arising from production of construction materials (such as cement), and the operation of construction vehicles and plant. These will be restricted to the duration of the construction phase, and as such will give rise to emission over a short-term duration. However, once emitted to the atmosphere, the greenhouse gas emissions that will arise from construction phase activities will have a permanent imperceptible negative effect on Climate, which is Not Significant.

11.6.2 Operational Phase

The nature of the Prospective Development is such that, once operational, it will have a long-term, moderate, positive impact on Climate, which is Not Significant. However, as noted above, the Prospective Development will offset the **144,929** tonnes of CO_2 associated with the construction and operational phase that will be lost to the atmosphere (Section 11.4.3.1) in approximately **33** months of operation.

When considering these greenhouse gas emissions within the context of the Electricity Sector Emissions Ceilings detailed in Section 11.2.2, Carbon Budget 1 (2021-2025) has an Electricity Sector budget of 40 MtCO2eq. and Carbon Budget 2 (2026-2030) has an Electricity Sector budget of 20 MtCO2eq for large-scale deployment of renewables. As detailed in Section 11.4.3.2, the Prospective Development will displace carbon dioxide from fossil fuel-based electricity generation, over its proposed 25-year lifespan. Therefore, while there will be greenhouse gas emissions associated with the construction of the Prospective Development, this will take place under the Electricity sector emissions ceiling and will be offset by the operation within its 25 year life. Thus, there will be no cumulative effects arising on climate from the Prospective Development and other permitted or proposed projects in the area as set out in Section 2.10 in Chapter 2 of this EIAR.

11.6.3 Decommissioning Phase

The works required during the decommissioning phase are described in Section 4.11 in Chapter 4: Description of the Prospective Development and detailed in Appendix 4-6 Decommissioning Plan of this EIAR. Any cumulative impact and consequential effect that occurs during the decommissioning phase are similar to that which occur during the construction phase, be it of less impact. The mitigation measures prescribed for the construction phase of the Prospective Development will be implemented during the decommissioning phase thereby minimising any potential cumulative effects.

11.7 In-Cumulation Effects

This section considers the in-cumulation impact of the combination of the Existing Development and Prospective Development (the Subject Development).

11.7.1 Carbon Losses and Savings Calculations – Subject Development

11.7.1.1 Carbon Losses – Subject Development

The main CO_2 losses due to the Subject Development are summarised in Table 11-7.

Table 11-7 CO_2 Losses from the Subject Development

Origin of Losses	CO_2 Losses (tonnes CO_2 equivalent)	
	Expected	Maximum
Losses due to reduced carbon fixing potential	1,778	3,586
Losses from soil organic matter	131,629	696,884
Losses associated with embodied carbon in construction materials	21,048	95,212
Losses associated with traffic and transport movements	260	260
Losses associated with pre-construction activities	273	273
Losses associated with construction activities	9,734	9,734
Losses due to turbine life (e.g., manufacture, construction, decommissioning)	76,329	76,329
Losses due to backup	43,641	43,641
Total	284,692	925,919

The worksheet models and online tools calculate that the Subject Development will give rise to 284,692 tonnes of CO_2 equivalent losses over its 25-year life. Of this total figure, the proposed turbines directly account for 76,329 tonnes, or 26.8%. Losses due to backup account for 43,641 tonnes, or 15.3%. Losses from reduced carbon fixing potential accounts for 0.6% or 1,778 tonnes. Losses from soil organic matter, i.e., CO_2 loss from disturbed soil and subsoils, will equate to 131,629 tonnes, or 46.2%. Losses due to pre construction activities account for 273 tonnes or 0.1%, while losses due to construction activities account for 9,734 tonnes or 3.4%. Losses due to embodied carbon accounts for 21,048 tonnes or 7.4% and losses due to construction phase transport emissions accounts for 0.1% or 260 tonnes.

The figure of 131,629 tonnes of CO_2 arising from disturbed soil and subsoils (i.e., peat) and ground activities associated with the Subject Development is calculated from a conservative estimate of 86,240m^3 of peat being displaced as part of the November 2020 Peat Slide, the total volume of excavated peat (450,900 m^3) from the Existing Development and the Prospective Development as detailed in Section 11.4.3 above. These values have been manually input into the Macauley Tool to ensure the alignment of the final carbon loss outputs with the values quantified within Appendix 6-2.

This total area is calculated based on the entire Subject Development footprint being in "Acid Bog", as this is one of only two choices the model allows (the other being Fen). The habitat that has and will be impacted by the Subject Development footprint comprises a mix of peatland and coniferous forestry rather than acid bog, as assumed by the model. The value of 1,778 tonnes of CO_2 arising from ground activities in 'Acid Bog' is under a precautionary scenario, and therefore the actual CO_2 losses are expected to be lower than this value.

The values discussed above are based on the assumption that no habitat enhancement or afforestation activities will take place as part of the Subject Development. As detailed in Section 4.4.1.9 of this EIAR, the estimated 9 hectares (ha) of forestry that will be permanently felled for the footprint of the Wind Farm Site infrastructure will be replaced or replanted on a hectare for hectare basis as a condition of any felling licence that will be issued in respect of the Prospective Development. As detailed in Appendix 6-4 of this EIAR, a Biodiversity Management and Enhancement Plan (BMEP) for the Prospective Development has identified enhancement activities such as the creation of hen harrier habitat and peatland habitat. As detailed in Section 11.4.3.2 above, a derogation will be sought in relation to the felling requirements at the BMEP Site, and if obtained, no replanting will be required for the felling that is undertaken. In the event that this derogation is not obtained, the replanting obligation for the felling undertaken at the BMEP Site be replanted on a hectare for hectare basis outside the hydrological catchment within which the Prospective Development is located.

The figure of 21,048 tonnes of CO_2 arising from the embodied carbon of construction materials associated with the Subject Development is calculated based on the types of materials available in the TII Carbon tool such as, concrete, steel, cement and granular fill, and assumes that each HGV or LGV will be carrying material at its full capacity. The figure of 260 tonnes of CO_2 arising from transport movements associated with construction activities of the Subject Development is calculated based on the assumption that material will be imported locally or from a port/city location where applicable. Details on the assumptions made for the modelling of embodied carbon and construction phase transport emissions are included in Appendix 11-2 of this EIAR and Appendix 11-2 of the rEIAR.

The figure of 273 tonnes of CO_2 associated with pre-construction activities is based on the 73.6ha of tree felling that was removed as part of the Existing Development and the 121.5ha of tree felling proposed as part of the Prospective Development, and the area of peat lost to the November 2020 Peat Slide and general excavation activities within peatland undertaken throughout the Existing Development and those proposed as part of the Prospective Development. As outlined in Section 11.4.1 above, replanting has not been included due to fact that the carbon storage capacity of restored habitats will vary over time as vegetation matures and land use and the baseline environment change. To ensure this assessment is completed under a theoretical precautionary scenario the quantification of these potential carbon savings (via an increase in carbon storage potential) associated with replanting has not been included.

The figure of 9,734 tonnes of CO_2 arising from construction activities is associated with the volume of material won from the footprint of the Existing Development and material proposed to be won from the Prospective Development and utilised within the Wind Farm Site. As identified in section 4.4.1.4.4 of Chapter 4 of this EIAR and Section 4.4.1.3 of Chapter 4 of the rEIAR, approximately 70,000m3 of rock is proposed to be won on the Wind Farm Site for use and approximately and approximately

507,808.35m3 of rock has been won on site for use. The use of the 577,808.35m^3 of rock has therefore been utilised to inform Table 11-7 above.

The values discussed above are based on the assumption that the hydrology of the Subject Development and habitats within the Wind Farm Site are not restored on decommissioning of the Meenbog Wind Farm after its expected 25-year proposed operational life. As detailed in the Decommissioning Plan, Appendix 4-6 of this EIAR, the wind turbines and met mast will be dismantled and removed offsite. It is not intended to remove the concrete foundations from the ground as it is considered that its removal will be the least preferred options in terms of having potential effects on the environment. The associated foundations that protrude above ground level will be covered over with soil - reinforced concrete foundations remaining in-situ. The underground electrical cabling connecting the turbines to the on-site substation will be removed from the cable ducts. The cable ducting will be left in-situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance. The cable materials will be transferred to a suitable recycling or recovery facility. Taking into account the proposals incorporated in the Decommissioning Plan, the actual CO2 losses are expected to be lower than the values detailed in Table 11-7.

11.7.1.2 Carbon Savings – Subject Development

According to the model described above, the Subject Development will give rise to total losses of 284,692 tonnes of carbon dioxide. As detailed in Section 11.4.3.2 above, **53,097** tonnes of carbon dioxide will be displaced per annum from the largely carbon-based traditional energy mix by the Subject Development. Over the proposed 25-year lifetime of the development, therefore **1,327,425** tonnes of carbon dioxide will be displaced from traditional carbon-based electricity generation.

The approximately 284,692 tonnes of CO_2 will be lost to the atmosphere due to changes in the soil and ground conditions and due to the construction and operation of the Subject Development represents **21%** of the total amount of carbon dioxide emissions that will be offset by the Subject Development. The 284,692 tonnes of CO_2 that will be lost to the atmosphere due to changes in soil and ground conditions and due to the construction and operation of the Subject Development will be offset by the Subject Development in approximately **64** months (5.4 years) of operation.

As detailed in Section 11.4.3.1 above, habitat enhancement and afforestation activities will take place as part of the Subject Development. As detailed in Section 4.4.1.9 of this EIAR, the estimated 9 ha of forestry that will be permanently felled for the footprint of the Wind Farm Site infrastructure will be replaced or replanted on a hectare for hectare basis as a condition of any felling licence that will be issued in respect of the Prospective Development. Similarly, as detailed in Appendix 6-4 of this EIAR, a BMEP for the Prospective Development has identified enhancement activities which includes forestry felling of approximately 108 ha and the enhancement of approximately 6.2 ha of peatland habitat. These activities, over the lifetime of the Subject Development have the potential to give rise to carbon savings; please note, this potential has not been quantified but is considered in Section 11.5.3 below. The carbon storage capacity of restored habitats will vary over time as vegetation matures and land use and the baseline environment change. Therefore, while it can be assumed that the on the Site will result in an increased capacity of carbon storage due to the carbon storage potential that exists within these habitats[62], to ensure the assessment below is identified under a theoretical precautionary scenario the quantification of these potential carbon savings (via an increase in carbon storage potential) associated with these measures has not been included in the below assessment outside of an assumed offset potential.

The effects on Climate from both the Prospective Development and Existing Development are considered to be Not Significant.

[62] https://teagasc.ie/news–events/daily/carbon-stocks-and-sequestration-in-hedgerows/

Given the reduction in greenhouse gas emissions that will result from the Prospective Development, there will be no significant cumulative effects on climate resulting from the Prospective Development in-combination with the Existing Development. The potential for In-Cumulation effects from the Subject Development is therefore Not Significant.

11.8 Cumulative Effects – Subject Development

The potential for impact between the Subject Development (Prospective Development and Existing Development combined), and other relevant developments has been carried out with the purpose of identifying what influence the Subject Development will have on the surrounding environment when considered cumulatively and in combination with relevant existing permitted or proposed projects and plans in the vicinity of the Site, such as other wind energy developments, extractive industries, battery energy storage systems, forestry etc. Please see Section 2.10 of Chapter 2 of this EIAR and the rEIAR for the cumulative assessment methodology used.

During the construction phase of the Subject Development and the construction of other permitted or proposed projects and plans. in the area (please see Section 2.10 in Chapter 2 and Appendix 2-1 of this EIAR and the rEIAR), there will be emissions from construction plant and machinery associated with the construction activities. However, once the mitigation proposals, as outlined in the above assessment are implemented during the construction phase of the Subject Development, there will be no cumulative negative effect on Climate.

Exhaust emissions during the operational phase of the Subject Development will be minimal, relating to the use of maintenance vehicles onsite, and therefore there will be no measurable negative cumulative effect with other developments on Climate.

The nature of the Subject Development is such that, once operational, it will have a long-term, moderate, positive impact on the climate. When considered cumulatively with other renewable energy projects, this will have a long-term, significant, positive impact on Climate There will be no measurable negative cumulative effect with other developments on Climate.

11.8.1 Construction Phase

During the construction phase of the Subject Development and other permitted or proposed projects and plans in the area as set out in Section 2.10 in Chapter 2 of this EIAR and the rEIAR, that are yet to be constructed, there will be greenhouse gas emissions arising from production of construction materials (such as cement), and the operation of construction vehicles and plant. These will be restricted to the duration of the construction phase, and as such will give rise to emission over a short-term duration. However, once emitted to the atmosphere, the greenhouse gas emissions that will arise from construction phase activities will have a permanent imperceptible negative effect on Climate, which is Not Significant.

11.8.2 Operational Phase

The nature of the Subject Development is such that, once operational, it will have a long-term, moderate, positive impact on Climate, which is Not Significant. However, as noted above, the Prospective Development will offset the **284,692** tonnes of CO_2 associated with the construction and operational phase that will be lost to the atmosphere (Section 11.7.1.1) in approximately **64** months of operation.

When considering these greenhouse gas emissions within the context of the Electricity Sector Emissions Ceilings detailed in Section 11.2.2, Carbon Budget 1 (2021-2025) has an Electricity Sector budget of 40 MtCO2eq. and Carbon Budget 2 (2026-2030) has an Electricity Sector budget of 20 MtCO2eq for large-scale deployment of renewables. As detailed in Section 11.4.3.2, the Meenbog Wind Farm will displace carbon dioxide from fossil fuel-based electricity generation, over its proposed 25-year lifespan. Therefore, while there will be greenhouse gas emissions associated with the construction of the Subject Development, this will take place under the Electricity sector emissions ceiling and will be offset by the operation of the Meenbog Wind Farm within its operational life. Thus, there will be no negative cumulative effects arising on climate from the Subject Development and other permitted or proposed projects in the area as set out in Section 2.10 in Chapter 2 of this EIAR and the rEIAR. When the Subject Development is considered cumulatively with other renewable energy projects, this will have a long-term, significant, positive impact on Climate.

11.8.3 Decommissioning Phase

The works required during the decommissioning phase are described in Section 4.11 in Chapter 4: Description of the Prospective Development and detailed in Appendix 4-6 Decommissioning Plan of this EIAR. Any cumulative impact and consequential effect that occurs during the decommissioning phase are similar to that which occur during the construction phase, be it of less impact. The mitigation measures prescribed for the construction phase of the Subject Development will be implemented during the decommissioning phase thereby minimising any potential cumulative effects.

11.9 Transboundary Effects

As stated in Section 11.1.2 above, the impacts and resulting effects of greenhouse gas emissions are global rather than affecting one localised area. The Climate Study Area for the Subject Development is defined as the national environment (Ireland), where the receptor is the climate and the global atmosphere. Taking this into account, any GHG emissions associated with the Subject Development, has by default, a transboundary effect and these effects are not measurable or perceptible between Ireland and Northern Ireland. However, as assessed above, there are no significant effects on climate change and greenhouse gas concentrations either alone, in cumulation or cumulatively with the Subject Development or other proposed, consented plans or projects, given the scale and nature of the emissions, the offsetting effect of the operational phase and the sectoral emissions ceiling under which the Subject Development will be constructed and operational.

As stated in the IEMA 2022 guidance *'greenhouse gas emission impacts and resulting effects are global rather than affecting one localised area'*[63]. Therefore, the potential for Transboundary effects arising from the potential impacts on climate are considered within the Climate Study Area. There is no potential for significant Transboundary Effects from the Subject Development.

[63] *IEMA (2022). Assessing Greenhouse Gas Emissions and Evaluating their Significant, 2nd Edition. Available online at:* https://www.iema.net/resources/blog/2022/02/28/launch-of-the-updated-eia-guidance-on-assessing-ghg-emissions