Minister Heydon
Agriculture House,
Kildare Street,
Dublin 2, D02 WK12

Minister O'Brien
Tom Johnson House,
Haddington Road,
Dublin 4, D04 K7X4

Open letter to the Irish Presidency of the Council of the European Union 2026

Call for a critical reassessment of EU and Irish biomethane targets and industrial biogas expansion

July 2026

Dear Minister Heydon and Minister O'Brien,

Congratulations on Ireland's Presidency of the Council of the European Union. Given the current political and environmental context, we believe this is a crucial moment to help steer European climate and energy policy in the right direction.

We, the undersigned organisations, community groups, farmers' groups, and civil society representatives from across Europe, are writing to express our growing concern regarding the current direction of EU biomethane policy and the rapid expansion of industrial-scale biomethane infrastructure in Europe. While interest in scaling up biogas and biomethane is growing at both Member State and EU level, important perspectives and voices remain absent from these discussions.

The European Commission's commitment to scale up biomethane production without any environmental impact assessment risks locking Europe into a new generation of environmental, social, and economic harms, particularly in rural communities already under pressure from industrial agriculture and energy infrastructure. Increased emphasis from the sector and incentivised by specific national and EU policies (e.g. RED III) on using manure from the livestock sector as a source of energy is in contradiction with adjacent policy objectives related to food and agriculture. For example, the overall achievement of the European Green Deal objectives is expected to require a reduction of 10-15% in livestock production (1), with even greater reductions needed to meet long-term climate commitments.

(1) Jongeneel, R., Silvis, H., Gonzalez Martinez, A., & Jager, J. (2021). The Green Deal: An assessment of impacts of the farm to fork and biodiversity strategies on the EU livestock sector https://research.wur.nl/en/publications/the-green-deal-an-assessment-of-impacts-of-the-farm-to-forkand-b/

Current greenhouse gas accounting methodologies also fail to reflect the full lifecycle impacts of biogas manure feedstocks, which are often treated as by-products rather than as co-products of industrial livestock production. Agriculture is responsible for 56% of the EU's methane emissions,(2) and methane from livestock production is a significant portion of this. Emissions from enteric fermentation are not addressed by biomethane production, a process which also often leads to methane leakage and associated emissions from animal feed (domestic and imported).

This approach is increasingly inconsistent with broader EU objectives under the European Green Deal, the Nature Restoration Law, public health objectives, biodiversity commitments, and the growing recognition of the need for more sustainable and resilient food systems and key climate commitments under the Paris Agreement and the Global Methane Pledge.

As the Irish Presidency helps shape the European agenda during a decisive period for climate, agricultural and energy policy, we urge you to ensure that Europe's energy transition does not deepen dependence on industrial livestock production, undermine biodiversity and climate goals, or place disproportionate burdens on rural communities.

Industrial biomethane expansion risks locking in unsustainable and insecure farming models

Current biomethane policy frameworks, particularly under REPowerEU and the proposed CAP 2028-34 framework, increasingly rely on livestock manure as a major feedstock for future gas production, with industry expectations of contributing a third of total EU biomethane production by 2030 (3). This creates dangerous structural incentives to maintain or expand industrial livestock production at a time when scientists are clear that reducing livestock numbers and supporting dietary shifts are essential for achieving climate and biodiversity goals (4).

Across Europe, industrial biomethane projects are contributing to the expansion locking-in concentration and intensification of livestock production systems. The economic logic of large-scale anaerobic digestion favours ever larger farms, greater manure volumes, and increased integration between industrial livestock and gas infrastructure. This could leave the EU facing significant economic and environmental impacts from water pollution and reduced air quality directly from the plants, and from methane leaks which often go unreported (5).

(2) European Environment Agency (2025). Methane, climate change and air quality in Europe: exploring the connections https://www.eea.europa.eu/en/analysis/publications/methane-climate-change-and-airquality-in-europe-exploring-theconnections#:~:text=Emissions%20from%20livestock%20management,of%20the%20EU's%20methane %20emissions.
(3) Foodrise EU. (2024). Biomethane from manure: a curse, not a cure. The biomethane rush driving intensification of livestock production in Europe https://foodrise.eu/wpcontent/uploads/sites/2/2024/11/Report-Biomethane-from-Manure-Oct24_FINAL.pdf.
(4) European Scientific Advisory Board on Climate Change (2026) Climate adaptation and mitigation in the agri-food system: Recommendations for coherent EU policies. https://climate-advisory-board.europa.eu/reports-and-publications/climate-adaptation-and-mitigation-in-the-agri-food-system-recommendations-for-coherent-eu-policies, Simon, W.J., Hijbeek, R., Frehner, A. et al. Circular food system approaches can support current European protein intake levels while reducing land use and greenhouse gas emissions. Nat Food 5, 402–412 (2024). https://doi.org/10.1038/s43016-024-00975-2
(5) Methane Matters Coalition (2025) Biogas in the EU: Levelling up or locking in? https://changingmarkets.org/wp-content/uploads/2025/10/Biogas-policies-in-the-EU_Levelling-up-orlocking-in.pdf

This trajectory risks locking Europe into continued dependence on manure produced by industrial-scale livestock production, imported feed crops, long supply chains, and environmentally destructive agricultural systems while diverting public funding and political attention away from genuinely transformative solutions, including:

1. In the energy sector: energy efficiency measures like insulation, electrification of heat and transport powered by cheap efficient renewables like wind, solar and battery storage
2. In agriculture: agroecology, nature restoration, and the transition toward healthy sustainable plant-rich diets.

Rural communities are bearing the costs

The rapid expansion of industrial-scale biogas developments across Ireland and other EU Member States, is creating growing concern among rural communities who fear they are being asked to carry an unfair societal and environmental burden.

National Biogas Concern Group, Ireland: "*While renewable energy and alternatives to fossil fuels are necessary for climate action, many communities believe that current proposals for large anaerobic digestion and biogas facilities are being pursued without adequate consideration of the long-term impacts on people, infrastructure, and the environment. Small communities across Ireland are left to oppose each development on a case-by-case basis as no industry specific national planning regulations exist.*

One of the principal concerns is the scale and intensity of these developments in predominantly rural areas. Industrial biogas facilities require continuous deliveries of feedstock and the export of digestate by-products. This results in a substantial increase in heavy goods vehicle traffic on narrow rural roads that were never designed to accommodate industrial transport volumes. Developers frequently emphasise green jobs and economic opportunities, while opponents argue that profits are often concentrated among developers, investors, and large agribusiness interests. Local people are left to experience the negative externalities of industrialisation without receiving meaningful long-term benefits in return."

The environmental risks are equally concerning including high water consumption, biodiversity loss, soil health, and groundwater quality. Without careful planning and strong regulatory frameworks, the unchecked growth of industrial biomethane production risks undermining the very communities it relies on. EU policy must ensure that biomethane development aligns with local needs and capacities. This includes enforcing strict environmental safeguards, mandating genuine community participation, and supporting the development of appropriately scaled, circular bioenergy systems.

The EU's biomethane ambitions have advanced without a comprehensive independent impact assessment of their cumulative effects on climate, land use, food systems, biodiversity, public health, and rural communities.

We therefore call on the Irish Presidency and EU institutions to:

1. **Support an independent EU-wide impact assessment** of current biomethane targets and associated infrastructure expansion.

2. **Ensure that EU biomethane policy does not incentivise** the continuation or expansion of industrial livestock production.

3. **Restrict biomethane use to its sustainable niche** in a few harder to electrify (primarily industrial) sectors, and to using truly unavoidable waste feedstocks (like inedible food waste) and appropriately scaled circular systems over industrial feedstock models dependent on intensive livestock farming.

4. **Prioritise energy efficiency measures** like insulation, and electrification of heat and transport – through measures such as heat pumps and battery electric vehicles – powered by cheap renewables like solar, wind and battery storage.

5. **Prioritise a shift to agroecology**, nature restoration, and healthy sustainable plant-rich diets.

6. **Guarantee meaningful participation**, transparency, and democratic consent for affected local communities in biomethane project planning and permitting processes.

7. **Align EU energy policy** with climate, biodiversity, public health, animal welfare, and sustainable food system objectives.

Europe urgently needs a just and coherent transition away from fossil fuels and environmentally destructive industrial systems. The current trajectory of industrial biomethane expansion risks deepening both.

We urge the Irish Presidency to help ensure that Europe's energy transition supports resilient communities, sustainable food systems, and genuine climate solutions.

Sincerely,

FOODRISE

NATIONAL BIOGAS CONCERN GROUP IRELAND

Deutsche Umwelthilfe

Institute for Agriculture & Trade Policy EUROPE

biofuelwatch

EEB European Environmental Bureau

Changing Markets FOUNDATION

REV .institute

Caring Farmers

EUROGROUP FOR ANIMALS

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