



NATIONAL MITIGATION PLAN

SUBMISSION TO PUBLIC CONSULTATION

Submitted by:
Adam Ledwith
Head of Communications

Submission date:
26/04/2017

Draft National Mitigation Plan Consultation
Climate Policy Division
Department of Communications, Climate Action and Environment,
29-31 Adelaide Road,
Dublin D02 X285.

26 April 2017

Re: Draft NMP consultation – Irish Wind Energy Association

To Whom It May Concern,

The following document sets out the views and observations of the Irish Wind Energy Association (IWEA) on the Draft National Mitigation Plan published by the Minister for Communications, Climate Action and Environment Denis Naughten TD on March 15th 2017.

IWEA is the leading renewable energy representative body in Ireland and as such has an active interest in the potential for renewable energy, and in particular wind energy, in Ireland. IWEA works in a proactive and engaging manner with stakeholders in this area and as such feels it is both appropriate and important to make a submission on the Draft NMP.

IWEA welcomes the publication of the Draft NMP and this opportunity to respond to it. This submission follows on from earlier IWEA submissions to the SEA Scoping Report for the National Mitigation Plan NMP, dated October 29th 2015 and IWEA's July 29th 2015 submission to the Department on the Development of Ireland's First National Low Carbon Transition and Mitigation Plan.

IWEA believes the challenges and opportunities raised throughout the document are extremely timely for Ireland and that a full and forthright debate about the country's energy policy for the coming decades is required.

IWEA very much welcomes the opportunity to make the following submission and look forward to engaging constructively with policymakers as the NMP moves forward.

Sincerely,



Adam Ledwith
Head of Communications and Public Affairs

*Submission made by email to: NationalMitigationPlan@DCCAIE.gov.ie

Introduction

In recent years Ireland has become heavily dependent on imported fossil fuels to meet its energy needs. Ireland's high dependency on foreign energy imports is unsustainable and leaves Ireland vulnerable both in terms of meeting future electricity needs and ensuring price stability.

However, increasingly, renewable energy sources, particularly onshore wind, have added significant capacity and greater levels of self-sufficiency. This can continue in the years ahead with clear, credible, evidence-based policy making.

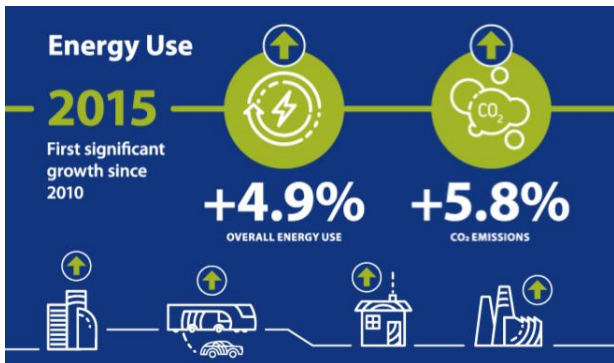
Ireland has the capacity to benefit greatly from an ambitious renewable energy agenda. There are also associated positive economic and FDI impacts from the availability of wind and renewable energy in Ireland.

The requirement for large scale data storage is growing year on year and data centres will be at the core of the 21st century economy. Given their considerable electricity consumption, internet giants, such as Facebook, Apple, Amazon, Intel, are increasingly looking to power their data centres using clean and renewable power sources, which constitutes a massive opportunity for Ireland, which has clean wind energy in abundance. Some of these companies have already urged Europe to be more ambitious and go much further than agreed targets envisage beyond 2020.

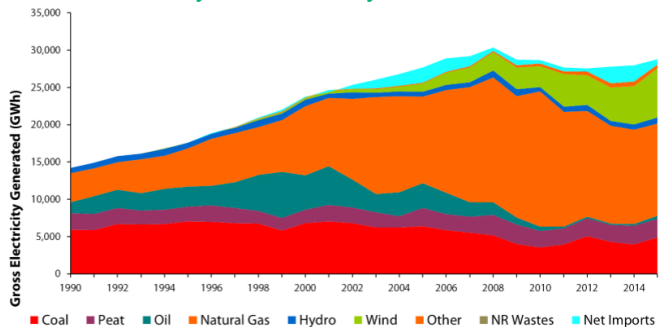
Ireland can be a world leader in renewable energy generation and renewable energy technology. The decarbonisation of the Irish economy represents enormous challenges for policymakers, industry and society. However, IWEA believes this is a journey worth undertaking for Ireland and it will result in greater employment, health, research and technology benefits for future generations.

Building on progress

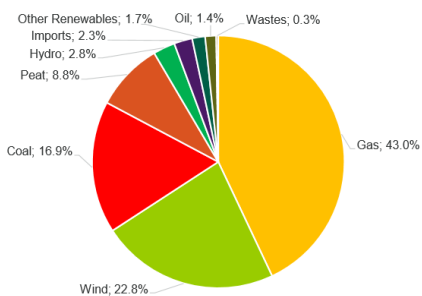
The increasing demand for energy in Ireland as a result of growth in the economy shows there is a need to provide more renewable energy sources in order to support this. Official data published by SEAI on 2015 shows 25.3% (22.8% wind) of Ireland's electricity came from renewables.



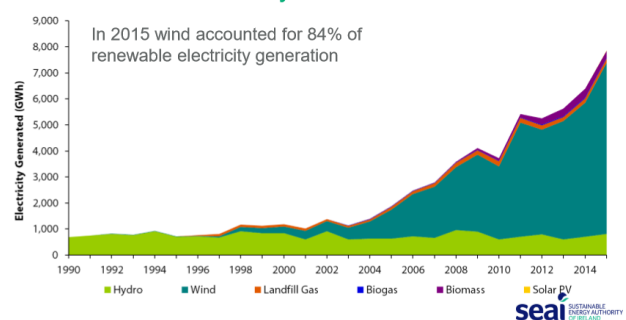
Gross Electricity Generated by Fuel 1990 – 2015



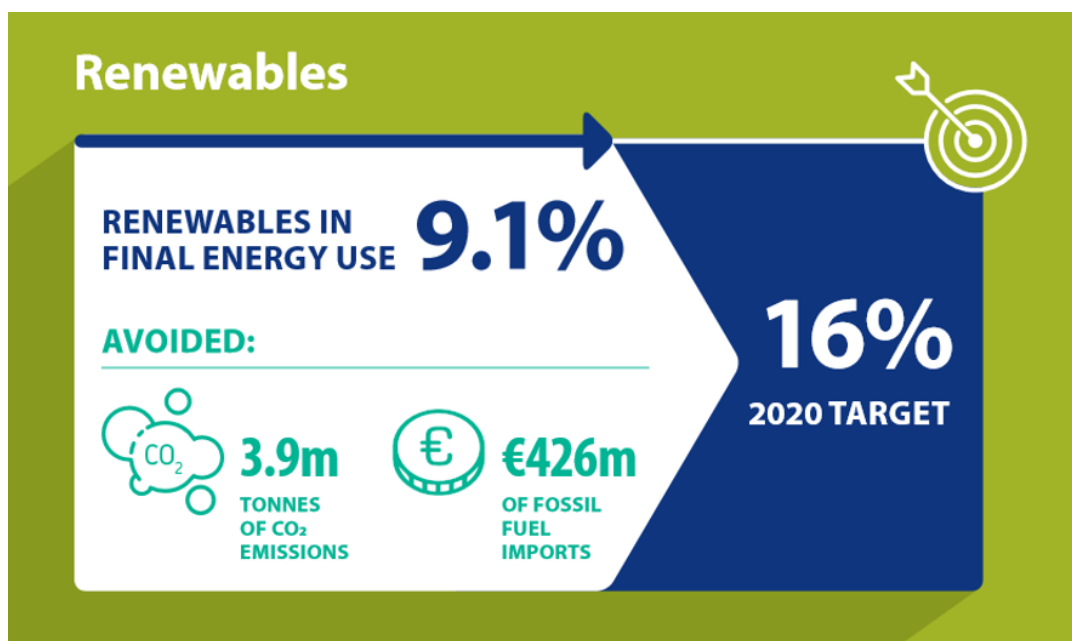
Electricity generated by source in 2015



Renewable Electricity Generation



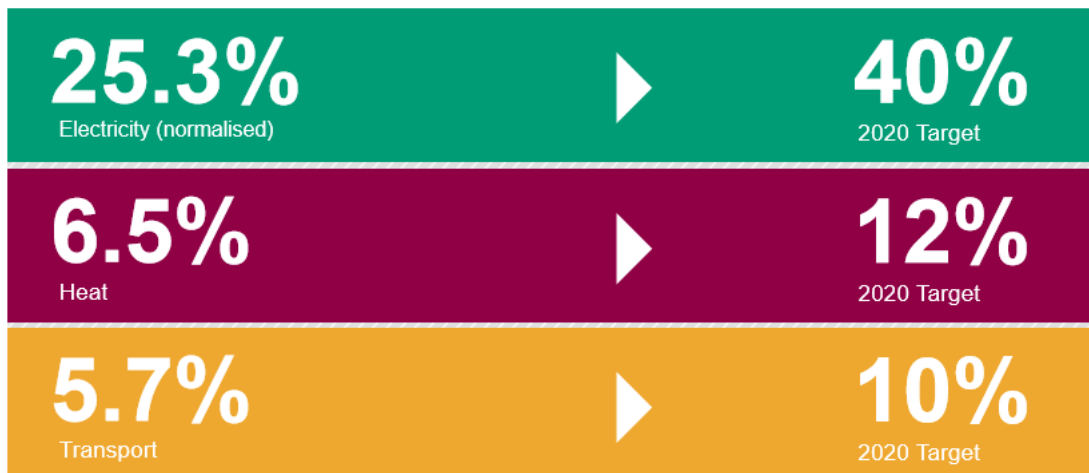
To achieve the 2020 Renewable Targets agreed with the European Union Ireland needs to produce 16% of all energy from renewable sources, currently we are slightly above 9%.



The possibility of Ireland not meeting its 2020 targets has been the source of much political discussion in recent weeks and months.

IWEA believes it is likely Ireland will not meet the RES-T (Transport) and RES-H (Heat) elements of its 2020 targets. However, IWEA believes the RES-E (Electricity) targets can still be achieved. This will require strong policy certainty and political support.

Progress towards renewable targets



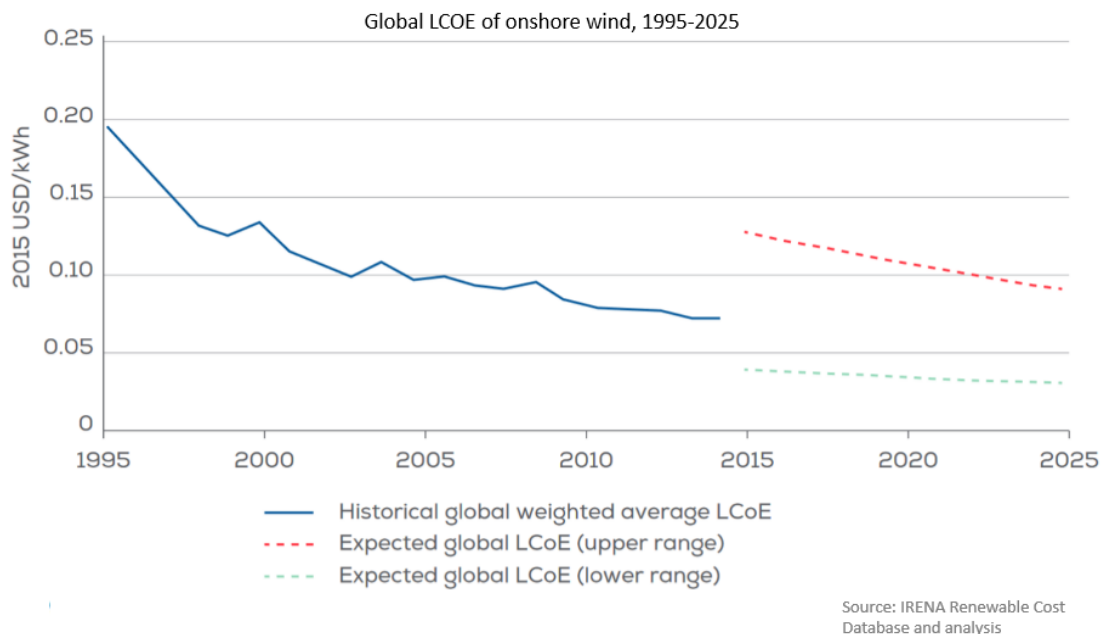
For Ireland to continue to progress with strong growth in renewable electricity, particularly from wind energy, SEAI estimates that 350MW (approximately) needs to be installed each year up to and including 2020. IWEA supports this analysis and believes that with support and policy certainty the wind industry can achieve this build out rate.

IWEA notes the EPA report entitled *Ireland's Greenhouse Gas Emission Projections 2016-2035*, published in April 2017. The main findings from the projections published in the report are:

- Ireland's non-ETS sector emissions are projected to be 4% - 6% below 2005 levels by 2020.
- Agriculture and transport dominate non-ETS sector emissions accounting for approximately 74% of emissions in 2020 under the With Additional Measures scenario. Emission trends from these sectors will be key determinants in terms of meeting targets.
- Agriculture emissions are projected to increase by 4% to 5% by 2020 from current levels. This reflects the impact of Food Wise 2025. Fertiliser use efficiency gains are assumed under the With Additional Measures scenario.
- Transport emissions are projected to show strong growth over the period to 2020 with 10% to 12% increase on 2015 levels. This reflects the strong economic growth forecasted over the next period.

While there is no doubt that change is required in the agriculture sector as well as other sectors, IWEA believes considerable progress and the advancement of renewables and decarbonisation in the electricity sector has the potential to result in agriculture enjoying greater space to adjust over a longer period. In short, IWEA believes the impact on Irish agriculture from the changes that are required in our economy could be mitigated by strategically and significantly expanding the delivery of renewable electricity through wind and other renewable sources.

IWEA believes a strong and stable diversified renewables mix should be a key objective for Ireland. To date Ireland’s renewable energy has been dominated by onshore wind. While IWEA believes in a diversified mix for the future it is impossible to see how onshore wind will not continue to dominate for many years to come. IWEA supports the development of off-shore wind energy for Ireland. Reduced costs in this area have made this an increasingly viable option for Ireland. Similarly, there is a role for solar energy development in Ireland as part of a more diversified renewable energy agenda. However, the case for onshore wind energy development in Ireland remains strong. Onshore wind costs are forecast to reduce by 26% by 2025. The Draft National Mitigation Plan rightly notes that **“onshore wind has to date been the most cost-competitive renewable electricity technology in Ireland.”**



As part of any public policy debate on diversifying Ireland’s renewable energy mix IWEA believes it is important to state that it anticipates significant issues of social acceptance and community support for offshore wind energy and solar energy projects. Work around community engagement, shared ownership and wider community gain discussed in this submission should be noted in this regard.

“In February 2014, the Government published the Offshore Renewable Energy Development Plan (OREDPP). The overall conclusion of the Strategic Environmental Assessment underpinning the OREDPP is that it would be possible to achieve up to 4,500MW from offshore wind and 1,500MW from wave and tidal devices, without impacting significantly on the environment.” – Draft National Mitigation Plan 2017.

Community Engagement

IWEA believes greater social acceptance in host communities and prospective host communities of renewable energy projects is crucial to achieving increased renewable energy use in Ireland.

“It is clear much more work needs to be undertaken proactively in local communities to reach out, build relationships, confidence and trust with the public. It is important that this is done in a timely and transparent manner. This will require leadership both inside and outside of industry.” – IWEA Chief Executive Dr. Gary Healy

IWEA is committed to working with policymakers on clear achievable changes in this area. IWEA believes this work would benefit from the existence of new strategic partnerships with community-based organisations and clear national policy objectives that are proactively discussed on a regular basis with the public.

IWEA supports efforts to bring about a more open and welcoming environment for renewable energy projects throughout the country. We believe there is a strong basis for this and note that the Draft NMP plan also states:

“A fully joined up and integrated approach, involving public sector bodies at national, regional and local level, will be necessary to address existing legitimate community concerns, and obstacles and delays that might hinder the achievement of low carbon targets for electricity generation. In particular, the expansion of renewable electricity and other forms of renewable energy raises issues of community engagement, participation and acceptance. While investment in infrastructure is an essential precondition for the expansion of renewable energy, community concerns have been raised in relation to the provision of this energy infrastructure. Effective community engagement is essential for building public confidence and will help Ireland achieve our transition to renewable electricity.”

Code of Practice

In December 2016 the Department of Communications, Climate Action and Environment published a new Code of Practice for Wind Energy Development in Ireland. The code cites 10 key areas for delivery on the part of wind energy developers and project operators. IWEA welcomed the publication of the code and has undertaken steps through 2017 to ensure members are best equipped and informed on its adoption.

IWEA has undertaken a series of workshops with members and is designing a new training course for members on community outreach and early engagement. IWEA is also working closely with the Sustainable Energy Authority of Ireland the IEA Task 28 project on Social Acceptance of Wind Energy. IWEA cross-promoted and participated in an IEA Task 28 gathering of international experts in Dublin in March 2017, the only external industry representatives to do so.

The Code of Practice for Wind Energy Development cites the need for Community Liaison Officers (CLOs) to be appointed for all existing operational wind farms as well as all wind farm projects currently in planning and pre-planning development. In recognition of this IWEA has established a database to store this information centrally.

As part of IWEA's ongoing stakeholder engagement it was agreed that IWEA should establish a new portal where members of the public, and indeed public representatives, could lodge matters of complaint or specific issues of concern relating to wind farms or proposed projects. This platform was launched in early 2017 and its establishment was communicated to all members of the Oireachtas.

Support for Communities

IWEA believes the empowerment of local communities through greater access to independent information is a significant part of achieving greater awareness of the importance of renewable energy projects and social acceptance.

IWEA believes local authorities should be resourced and financed to provide this support to communities and developers. There is a clear role for local government and central government in communicating national policy and promoting the importance of renewable infrastructure and investment.

There are international examples of local government and national government working in tandem on the importance of communicating renewable strategies to achieve CO2 targets. IWEA has looked at the framework in place in Scotland and believes there are lessons Ireland can draw from some of the policies implemented by the Scottish government.

Beyond 2020 Ireland will have new, ambitious targets for 2030. A renewable energy target of at least 27% will require a significant shift in thinking among policy-makers, industry and society. It is crucial the public is informed and educated about Ireland's policy-making in that regard. IWEA believes the public at large support ambitious renewable energy alternatives for Ireland and will support sensible and credible policy to deliver this.

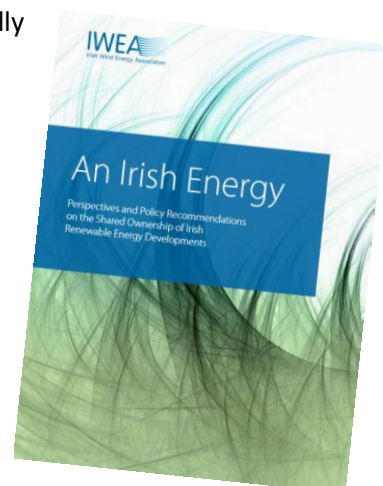
Shared Ownership

“Growing our renewable generation portfolio is critically dependent on the timely delivery of projects by industry. Industry is in turn dependent on the willingness of financial institutions to provide funding. Lack of early and meaningful engagement by industry with local communities has often resulted in lengthy planning processes, and legal challenges by third parties to planning authorisations, increasing the risks faced by industry and financial institutions. This in turn has slowed down the rate of build of new onshore generation.” – Draft National Mitigation Plan 2017.

The wind industry is always seeking new ways to contribute to vibrant communities. This includes supporting the wider objective as set out under the Energy White Paper “Ireland's Transition to a Low Carbon Energy Future 2015-2030” to move from a point of passive consumers to active energy citizens with roles and responsibilities in our national low carbon energy transition.

While most wind and renewable energy projects in Ireland have been successfully and sustainably delivered through private sector investment, IWEA recognises and welcomes the desire to diversify ownership structures. IWEA produced a dedicated document in Spring 2017 entitled *An Irish Energy*, the first sectoral perspective on approaches to shared ownership of renewable energy projects.

It is important to note that this paper was produced to contribute to a rich conversation on this issue and does not claim to be speaking for all stakeholders, as wind energy developers are only one partner in possible shared ownership structures. The paper provides a clear industry perspective on principles and possibilities, alongside 10 policy recommendations to enable joint shared ownership approaches which are viable and can succeed. IWEA believes if communities can acquire a stake in projects they are more likely to be disposed to hosting a project in their community.



It's important also to stress that shared ownership is to be seen within the prism of existing community engagement and benefit options not as an exclusive approach. IWEA believes that shared ownership should play a role as an option in Ireland's future renewable energy development alongside community benefit and options for developing Ireland's Energy Citizenship.

For shared ownership to be successful it must work for all parties, and there must be a stable regulatory environment and support. Communities must be empowered and enabled with the independent financial and advisory support necessary for informed decision-making. IWEA believes there is also a positive and proactive role for Government and agencies of the State in enabling and facilitating shared ownership.

IWEA believes there are three fundamental points that must be recognised from the outset however. There can be no “one size fits all” approach as project specific and community specific solutions are as diverse as communities themselves. Communities will require access to expert finance for advice, planning and project development from the earliest stages. Shared ownership is an investment and like all investments, it involves risk. This risk must be clearly explained, acknowledged and where possible, mitigated against.

IWEA's 10 recommendations on Shared Ownership

- 1** – In a competitive market for investment in Irish energy, there must be clear added value for all parties involved in shared ownership projects to support and encourage them in leading shared ownership as an approach
- 2** – Existing renewable energy authorities and agencies need to be resourced by the State to provide independent support to interested communities
- 3** – Communities must be enabled to appoint a community project manager themselves to act as a lead point for engagement on shared ownership projects
- 4** – Local Authorities should play an active role in planning and promoting shared ownership, ideally through a specific Renewable Energy Officer role
- 5** – Investment risks must be clearly explained, understood and in as much as possible mitigated against
- 6** – Existing wind energy development levies should be ring-fenced to empower local communities seeking a more active involvement in our low carbon transition
- 7** – A register of independent and accredited advisors for communities to protect communities should be developed and maintained
- 8** - Enterprise and investment agencies at state level should play a role in enabling access to innovative financing for shared ownership investments
- 9** – Target and promote tax incentives for shared ownership investment by small scale investors. Examine proposals for use of local Post Office and Credit Unions as green investment aggregators for those wishing to invest in shared ownership opportunities, breathing new life into Post Offices and local Credit Union networks
- 10** – Take forward shared ownership through a fact based multi-stakeholder forum with expert input

Conclusion

The Irish Wind Energy Association supports an ambitious National Mitigation Plan for Ireland and believes that renewable energy developers and operators have the desire and capacity to continue to invest in Ireland's clean energy future.

IWEA believes Ireland can be particularly ambitious with new and emerging technologies. Storage will have a role to play in Ireland in the years ahead as a way to deal with intermittency and IWEA believes this is an area where strategic policy decisions and incentives could yield huge gains for the country in the longer-term.

Ireland requires policy certainty in the area of renewables. The establishment of the Department of Communications, Climate Action and Environment in 2016 offers a real opportunity for that policy certainty and the necessary decision making and leadership to be centralised and delivered with greater cohesion.

To assist this policy and decision making IWEA believes a new Facilitation of Renewables study should be undertaken, with an emphasis on energy opportunities to 2030. This would set out to examine the technical challenges in delivering for 2030 targets. It would also further examine how increased volumes of wind and a diversified renewables mix can be supported. Previous work in this area by EirGrid and SONI has been extremely helpful.

IWEA would welcome clear national policy that explicitly supports increased indigenous renewable energy, including wind, as part of a consistent framework that delivers energy security of supply while informing and educating society on the importance of transitioning to a low carbon economy.