

Irish Wind Energy Association,
Sycamore House,
Millennium Park,
Osberstown,
Naas,
Co. Kildare.

EPA Draft Strategy 2016-2020,
EPA Headquarters,
PO Box 3000, Johnstown Castle Estate,
County Wexford.

22nd October 2015

By email to strategy@epa.ie

Re: EPA Draft Strategy 2016-2020

Dear Sir/Madam,

The Irish Wind Energy Association (“IWEA”) is Ireland’s leading renewable energy representative body and as such has an active interest in the potential for renewable energy, and in particular wind energy, in Ireland. IWEA works closely as a stakeholder in the work of the Environment Protection Agency and so feel it is important to make a submission on the development of your strategy for the period to 2020.

IWEA warmly welcomes the work of the EPA, and shares the perspective that the EPA has a key role in supporting the development of a resource efficient low carbon economy and society.

IWEA are firmly of the view that Irish wind energy as our leading renewable energy asset can, alongside other Irish renewables make a continued valuable contribution to our national transition agenda and deliver a cost effective renewable option for Ireland’s homes, communities and businesses.

We very much welcome this opportunity to make a submission and look forward to engaging constructively with you in the future as this proceeds.

Yours sincerely,

**sent by email, bears no signature*

Brian Dawson
Head of Communications
Irish Wind Energy Association

Introduction

IWEA is Ireland's leading renewable energy representative body representing more than 200 members involved in wind and renewable energy development in Ireland and Northern Ireland, and represents members with projects across the spectrum, in operation, under construction and awaiting connection. IWEA members currently employ more than 3400 people in Ireland, are involved in the majority of connected projects and delivering more than 85% of the renewable energy required to deliver on our binding EU 2020 targets.

With the first Irish wind farm having been developed in Co. Mayo in 1992, wind energy is now an established feature of the Irish landscape, and IWEA Members have a deep and longstanding understanding of the need for landscape and environmental protection. Wind energy for the first half of 2015 met a quarter of Ireland's electricity demand.

Protecting Ireland's Environment through Reductions in our Green House Gas Emissions & Meeting Global Commitments

Climate change continues to be one of the most serious global environmental challenges. Low-carbon electricity production is one of the most cost-effective methods of reducing greenhouse gases in line with our European and international obligations to 2020 and beyond. We would ask that future policy development, including this EPA Strategic Plan underpins the transition to a low carbon energy system, a low emissions economy and a sustainable society.

IWEA is clear that the international context of Ireland's environmental protection goals must also be brought to the forefront within this strategy. With the 2020 EU Climate and Energy targets now on the horizon, the 2030 climate and energy policy under development, and the prospects of a global agreement on climate change to be reached later this year in Paris, it is vital that action on sustainable energy is pursued more urgently than ever.

The global focus on sustainable energy brings with it immense opportunities for Ireland given the resource we have in terms of our wind and other renewable capabilities. Ireland has sufficient accessible onshore wind energy resource to meet but also exceed our current renewable electricity target of 40% by 2020. In the longer term, Ireland has a landmass of around 90,000 square kilometres, but a sea area of around 10 times that size, at 900,000 square kilometres. Ireland's position at the Atlantic edge of the EU gives an almost unparalleled offshore energy resource, with suitable conditions available for the development of the full range of current offshore renewable energy technologies. Electrifying our energy requirement is therefore a logical route for Ireland.

The timeframe of this EPA Strategic Plan to 2020 is a crucial period coinciding with the need to focus on the delivery of EU 2020 Climate and Energy targets. The period to 2020 and beyond to 2030 also matches a period of sustained global efforts to tackle climate change through responsible energy use.

The Irish Government has, also in October 2014 agreed new EU targets to 2030 which include a 40% Green House Gas emission cuts and a binding renewable energy target of "at least 27%". While the detail of these proposals must yet be confirmed through the EU's legislative process, Ireland must begin our planning beyond 2020 to ensure our level of climate ambition matches these 2030 goals.

Specific Input on the Draft Strategy 2016-2020

As a sector which is now over 20 years old, wind energy in Ireland has been developing in parallel with the growing understanding and acknowledgement of importance of climate and environmental issues, security of supply concerns, and our Irish need to make a transition to a low carbon economy and power system.

We welcome the opportunity to be able to input to this important strategy, and to make the following constructive suggestions for the Draft Strategy.

EPA Vision

IWEA welcomes the EPA vision within the draft strategy of *“A clean healthy and well protected environment supporting a sustainable society and economy.”*

IWEA is clear that in order to achieve this focus there must be a stability and consistency in the supporting legal, regulatory and environmental policy areas. This regulatory stability is vital to drive investor confidence, and to support inward investment in the technologies necessary for Ireland’s electricity generation sector to further develop our low carbon credentials.

EPA Mission

While we also warmly welcome the EPA Mission as set out, we would propose an addition to emphasise the role of the agency in combating harmful emissions and propose the following change

*“To protect and improve the environment as a valuable asset for the people of Ireland. To protect our people and the environment from the harmful effects of **environmental emissions, radiation and pollution.**”*

EPA Strategic Goals for the Period 2016-2020

IWEA considers the five pillar approach to be a positive framework for EPA action to 2020.

In terms of the objectives under the heading of *“Trusted Environmental Regulator”* IWEA would propose the addition of a third objective to *“**Safeguard a clear evidential base to regulatory approaches with comprehensive consultation and sectoral engagement & to ensure stakeholders have early visibility of planned regulatory approaches.**”*

Within the *“Leader in Environment Evidence and Knowledge”* pillar, IWEA welcomes the focus on providing timely and tailored information to stakeholder groups. We would suggest that within this sector there be an explicit mention of media to the following

*“**Accelerate the provision of time and tailored information to meet the specific needs of stakeholder groups and to ensure proactive outreach to media on environmental issues towards informing factual local, national and digital coverage of key issues.**”*

Within the ‘Effective Advocate and Partner’ pillar, IWEA would propose a third objective to *“Advocate solutions towards a cleaner more sustainable environment.”*

Also within this same pillar in the ‘Outcomes’ section, IWEA would proposed a fourth point to have *“Driven public and policy engagement on environmental and climate issues including through further coordination and cooperation with other relevant agencies such as the SEAI.”*

Within the ‘Responding to Key Environmental Challenges’ pillar IWEA would propose that within the first objective the text be amended to *“Tackle the challenges to deliver improved water and air quality in Ireland.”*

IWEA welcomes the clear focus within the ‘Responding to Key Environmental Challenges’ pillar on climate change and the specific ‘Outcome’ focus on the establishment of an *“effective climate change secretariat in the EPA that supports the national transition to a low carbon economy.”*

However, we would note that this pillar is the only one which explicitly mentions the issue of climate change. Considering the pivotal role which the issue of climate change will play during the period of this strategy, IWEA would propose that an explicit mainstreaming of climate change across the five pillars be examined, perhaps also including a reference within the EPA’s mission statement.

Conclusion

The International Panel on Climate Change has put forward its clear assessment that the window for action on climate change is rapidly closing and that renewable energy sources such as wind energy will have to grow from 30% of globally electricity at present to 80% by 2050 if we are to limit global warming to below 2 degrees.

With this in mind we would echo the view stated by Minister Alan Kelly that *“As a nation we must do everything in our power to curb our emissions”* and ask that the need for urgent climate action and emissions reductions be clearly emphasised and prioritised within the EPA Strategy 2016-2020.

IWEA have absolute confidence that with the vision and commitment of all Government bodies, and a joined-up strategy connecting in with approaches such as the National Mitigation Plan and alongside the advice of the newly established Expert Advisory Council on Climate Change, that we can protect our Irish environment, ensure the wellbeing of our citizens and in reaching our 2020 targets, can also create jobs, attract significant investment, reduce carbon emissions and future-proof our energy system.

IWEA would welcome policies and objectives from the EPA that explicitly illustrate our national move towards indigenous renewable energy, maintain a consistency of policy framework, work to ensure our indigenous energy security of supply, and develop collaborative initiatives which clearly illustrate, inform and educate about how such a transition to a low carbon economy can continue to be moved forward.

We thank you again for the opportunity to contribute to the EPA Draft Strategy at this early stage and we look forward to further engagement on your subsequent work.