

Department of Public Expenditure and Reform,
Government Buildings,
Upper Merrion St.,
Dublin 2,

18th September, 2015

By email to guidelinesonconsultation@per.gov.ie

Re: IWEA Response to the Consultation on the Draft Guidelines for Public Consultation

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 as a proactive stakeholder in the work of the Department of Public Expenditure and Reform, and this submission to the **Consultation on the Principles/Guidance for Public Consultation** is part of our continuing positive engagement, and is intended to contribute actively towards future strategy.

IWEA welcomes this draft consultation, which aims to foster greater participation in public consultation and involvement in policy and service development.

IWEA Promoting Best Practice in Community Engagement

As a sector which is now over 20 years old, direct engagement with communities across the country on wind energy is a vital and intrinsic part of our work. IWEA has been a leader in developing best practice in community guidance around wind energy developments, including the following.

- The Best Practice Guidelines for the Irish Wind Energy Industry (2012)¹
- Good Neighbour: IWEA Best Practice Principles in Community Engagement & Community Commitment (2013)²

Climate change continues to be one of the most serious global environmental challenges and is already affecting the population of Ireland. Renewable energy development is a vital part of Ireland’s strategy to tackle two major challenges facing us today – ensuring a secure supply of energy and combating climate change.

IWEA supports a robust and inclusive consultation process, and recognises that direct engagement with the public and key stakeholders, is a key part of enabling Ireland to utilise our abundant natural clean energy renewable resources in a sustainable way to achieve our EU 2020 and 2030 climate and energy targets.

¹ <http://www.iwea.com/index.cfm/page/iweabestpracticeguidelines?twfId=1076&download=true>

² <http://www.iwea.com/index.cfm/page/iweabestpracticeprinciplesinco?twfId=1236&download=true>

Supporting Positive Approaches to Public Inclusion in the Consultation Process

The core objectives of this draft consultation are to promote open data and transparency, build participation, and strengthen governance and accountability. Within this context, IWEA also welcomes the stated view that: -

“Officials should recognise that involving stakeholders from the earliest possible stage in the policy development process will promote transparent and comprehensive participation.”

And that: -

“Consultation should also be seen as a recurring need in policy development and be carried out at various stages if appropriate, rather than be seen as a one-off event.”

The above approach echoes the engagement and involvement approaches outlined by IWEA within our own Best Practice Guidelines.

We share the view expressed that *“Effective consultation should allow Government to make informed decisions on matters of policy”*, in particular, we welcome the statement that *“Officials should also be mindful of the need to consult with each other to avoid creating cumulative or overlapping regulatory burdens, as well as seeking to capture Civil Service learning to make informed decisions.”*

IWEA would ask that there would be a clear role for relevant sectoral stakeholders within consultation processes. IWEA believes that sectoral expertise and experience can provide key insight and in addition, by ensuring as wide as possible access, all stakeholders involved will share a sense of participation, through full engagement in the consultation process.

We would suggest the addition of the words *“or sectors”*, (highlighted in bold below), in the following sentence, under the subsection, “Principles” (on page 6).

*“The size, type and scope of the consultative process depends on the proposed policy, the type and scale of the potential impacts of the proposal or decision being taken, the number of people, groups **or sectors** affected by them, and where relevant particular requirements of the child and young people and those who may be marginalised or vulnerable. “*

In conclusion, we thank you for the opportunity to make this submission. As a responsible sector, and one which is proactively engaged with the new provisions under the Regulation of Lobbying Act, 2015, we will continue to engage constructively on positive approaches to transparency and broader stakeholder consultation in relation to Ireland’s clean energy future.

Yours sincerely,

**sent by email, bears no signature*

Brian Dawson,
Head of Communications,
Irish Wind Energy Association.