

Fitzgerald House
Summerhill North
Cork
T23 TD9

MAC Assessment Consultation
Offshore Energy – Environment & Consenting Division
Dept Environment, Climate & Communications
29-31 Adelaide Rd, Dublin
D02 X285

16 February 2022

Re: Maritime Area Consent (MAC) Assessment Consultation

To whom it may concern

Cork Chamber represents 1,200 members together employing 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community.

As such, we are determined to ensure that our 202-year-old Chamber continues to create a positive legacy. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals five of which have been identified by the Chambers Ireland network.



Cork Chamber welcomes the Maritime Area Planning (MAP) Act 2021 and the creation of a new State consent, the Maritime Area Consent (MAC), as Ireland's leading response to the much-needed reform of marine



governance. MAC is a welcome first step in a new marine planning process to harness huge offshore wind potential while protecting Ireland's marine environment.

MARA will play an essential role, granting Maritime Area Consents, granting maritime licences for specific scheduled activities, including environmental surveys, ensuring robust compliance and enforcement measures, managing the existing State foreshore portfolio of leases which is an extensive portfolio of responsibilities.

Its establishment is critical in the context of Ireland's increased climate and energy ambition and legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030, as well as a target to increase the proportion of renewable electricity to up to 80% by 2030.

There are enormous development opportunities for offshore wind farms but success depends on political leadership, clarity, resourcing, financing and urgent time bound delivery by supportive agencies.

It is the view of Cork Chamber that 5,000MW should be seen as a minimum threshold target and that the overall target must be much more ambitious. The Celtic Sea alone has potential for 50GW of offshore wind.¹ The UK is set for 40GW by 2030, Germany for 40GW by 2040 and France for 40GW by 2050.

Funding and resourcing

At all times it must be remembered that Ireland became the second country in the world to formally declare a climate emergency in 2019 and that if action does not follow that declaration, the damage will not only be environmental but reputational. The required urgency must be reflected in the funding and resourcing of MARA. The pandemic has shown that the State can act in an exemplary manner in the face of emergency, and this experience in rapid scaling and utter commitment must be displayed once again.

The establishment of a new agency Maritime Area Regulatory Authority (MARA) with the operational objective to regulate development in the Maritime Area from the first quarter of 2023 is wholly welcome. Following its establishment, MARA will be the Relevant Authority. However, resources will likely be a challenge for relevant Government departments, An Bord Pleanála, Local Authorities, National Parks and Wildlife Service, EirGrid, ESB Networks and the Commission for Regulation of Utilities (CRU). It is essential that there is no weak link that inhibits the pace of development.

Until its realisation, the Department of the Environment, Climate and Communications (DECC) will perform this role for relevant projects only. Clarity and certainty is required for business and in the interim, it must be urgently resourced to deliver on the backlog of applicants that currently have nowhere to turn. For example, we understand that a ten-week process in the UK to apply for a foreshore licence for geo physical/technical work, can take as long as two years (104 weeks) in Ireland.

In its early stages, MARA will likely need to build capability and adequate capacity - flexible resourcing will be required to ensure timelines are met. If required outsourcing to a competent third party should be considered. It is essential that capacity does not place a ceiling on our renewable energy potential.

Consent Duration and Levies

We request that the thirty-year consent timeframe be revisited. Considering the lengthy consent, construction, operation and decommissioning phases of offshore wind projects is estimated to be at fifty years - of which thirty-five years approximately are operational. It must also be acknowledged that no other sector or development typology is subject to such constraints making their existence an anomaly.

¹ <https://www.corkchamber.ie/wp-content/uploads/2021/02/Cork-Harbour-2025-Ready-to-Float-Offshore-Wind.pdf>

Any development levies must be set at a rate that does not disincentivise development or investment and be agreed and periodically refined with close industry consultation. The deployment of large-scale renewables must be encouraged at every turn as a nationally strategic priority.

Investor confidence

Investor confidence is critical to the success of the Irish market and the capital investment, green energy, and jobs associated with the offshore wind sector need to be supported. MARA is a vital component to ensure Ireland's regulation, planning, policies, timeframes, investment and supports offer best in class business certainty and clarity. Regulatory conditions should support and empower renewable energy projects as a form of foreign direct investment that helps us meet our climate change targets.

The market exit of Equinor, a global energy supermajor and partner in a \$2.3bn, 1.5GW Irish offshore wind project has exited the market due to dissatisfaction with Ireland's regulatory and planning regime for offshore wind must not be repeated². The offshore wind industry must be enabled to deliver a stable and steady supply of green energy which is critical infrastructure and to meet the energy demands of manufacturing and foreign direct investment.

The timely processing of applications for relevant project status will go a long way to instil investor confidence. However, without certainty and action, future investment will not be sustained, and may in fact go elsewhere.

Readiness of the Supply Chain

A progressive regime for offshore wind presents an unparalleled opportunity for Cork and Ireland — to foster ethical energy solutions, a resilient economy and address the climate crisis. There are opportunities for business and employment in supply chain, turbine installation and construction and technical innovation.

Cork and Ireland must be ready to compete as a destination of choice for investment where competing projects in the UK, USA and Asia are already well underway. There are currently only three suppliers of offshore wind turbines worldwide and overall, the top three manufacturers represented over 90% percent share of deployed turbines. The supply chain and gearing-up for large-scale assembly and installation of offshore wind farms will be critical.

Only a few European seaports are currently suitable for floating wind manufacturing, assembly, and servicing however the UK Government are actively investing to ensure their Irish and Celtic Sea facing ports are placed to compete directly with Irish counterparts.³ The readiness of Ports for equipment delivery and assembly on and offshore can be enabled by MARA and Cork and Ireland can be a de facto-floating offshore wind hub in the Celtic Sea, as vision set out in the Cork Harbour Ready to Float Offshore Wind report published in 2021.

In summary, we urge for a stronger Government vision and supports for supply chain capture including ports, services, R&D and manufacturing.

Stakeholder Engagement and Public Interest

We welcome this consultation's emphasis on stakeholder engagement. Building understanding and awareness of the benefits of wind and renewable energy, to ensure that Irish wind energy continues to provide clean, cost-effective electricity to communities, businesses, factories, and homes across Ireland will be essential.

Engagement will be key to granting consent for offshore renewable energy projects in a way that complies with European environmental assessment obligations, facilitates Aarhus Convention compliant public

² <https://www.irishexaminer.com/opinion/commentanalysis/arid-40763970.html>

³ <https://www.maritime-executive.com/article/uk-and-scotland-agree-to-two-freeports-with-wales-expected-to-follow>



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participation, and gives Ireland a realistic chance of delivering new renewable energy sources allowing it to meet its 2030 climate change target.

The establishment of the Maritime Area Regulatory Authority (MARA) should go a long way to building confidence, reputation, and relevance of the sector to the broader economy. Stakeholders across industry, government and civil society have a unique opportunity to contribute to the rapid development of offshore wind plans in the seas around Ireland, with positive implications for infrastructure, jobs, environment, and economy.

Conclusion

Renewable energy, of which offshore plays a crucial role, is the economic opportunity of our generation. MARA is essential in making this opportunity a reality. Ireland must be powered by renewable energy and become a net exporter. The unique natural endowment of almost limitless maritime area and wind power is comparable to any mineral or energy asset globally. Any barrier to exploitation will be deemed inexplicable in the context of Climate Emergency. It is essential that every resource is made available to MARA, and that it functions with utmost efficiency, in partnership with stakeholders to make this the ultimate success story for Ireland.

Yours sincerely