



MAC Assessment Criteria Consultation
Offshore Energy- Environment and Consenting Division
Department of Environment, Climate and Communications
29-31 Adelaide Rd,
Dublin
D02 X285

[Redacted]

Dear Sir/Madam,

Hexicon would like to thank the Department of Environment, Climate and Communications for the opportunity to provide a consultation response to the Maritime Area Consents Assessment for Relevant Projects – Consultation Document (January 2022). Please find our consultation response below.

[Redacted]

Hexicon UK Development Manager

Section 1 - MAC Technical Assessment Criteria (Consultation Document Ref: 3.1.3)

Consultation Question

To what extent do you consider that the Guidance sets out a technical capability assessment process that is effective, efficient, and transparent? Are there any specific aspects of the Guidance that you consider require further clarification?

1.1 Rationale for Response

It is the opinion of Hexicon AB that the MAC Technical Capability Assessment Criteria (MTCAC) should focus on facilitating the advantages that Floating Offshore Wind (FOW) could bring to the Irish offshore wind energy matrix but also needs to consider that floating wind is still an emerging market when setting the assessment criteria. There are currently no commercial sized (100 MW+) FOW farms in construction or operation, the largest operational FOW farm to date is the 50 MW



Kincardine OWF. The UK has the most advanced pipeline of floating projects globally, and construction of the first 100 MW project in the UK is expected to be 2025 at the earliest.

Hexicon are concerned that by applying a strict pass/fail approach to the MTCAC requirements for construction and operational experience, the MTCAC as currently written would set an unachievable threshold for many FOW developers. There is a significant risk that both developers with valuable experience in developing the world's first FOW projects, and companies with valuable offshore experience who do not yet own or manage offshore wind projects would not be able to meet the threshold. We feel that there is also a risk that the assessment process would introduce a strong bias in favour of developers that may have a track record in delivering fixed offshore wind projects but have little or no experience in developing projects based on FOW technology which requires very different design, construction, and operational considerations.

Many of the large-scale floating projects awarded in the recent ScotWind leasing round have been awarded to developers with experience in fixed wind but little or no track record in FOW. These projects will be dependent on the advances of smaller FOW focused wind developers and technology companies to test and scale up FOW projects over the next 5-7 years. We believe that it is essential for the realization of large commercial (1 GW+) projects in the future, that smaller developers are able to access seabed early to develop smaller scale projects over the next 5-7 years that act as stepping stone projects and work with the local supply chain to allow them to make the investments at intervals that allow them to expand to a point where they can achieve 1GW+.

Hexicon request that a more flexible pass/fail criteria or scoring method be considered, or a separate assessment section for FOW developments be included to prevent developers with valuable and experience being prevented from successfully applying for a MAC.

1.2 Response to specific points

Hexicon would like to provide specific comment in relation to the technical criteria outlined in Section 3.1.3- Corporate Experience in delivering an offshore wind farm.

1.2.1 Construction Phase Experience

Current Requirement; At least twelve months continuous experience at the construction stage of an offshore wind farm of greater than or equal to 100 MW where the construction stage is deemed to end at point of first generation of all or part of the offshore windfarm.

- *The experience shall be within the 10 years immediately preceding the date of submission of the application documentation under the Maritime Area Planning Act 2021 Section 75(1) Maritime Area Consent Application Process*
- *The period of experience shall include the date upon which first generation of all or part of the windfarm was attained.*

Hexicon request that the criteria for the above assessment requirement be expanded to include the construction of other applicable offshore structures. In the current market, no 100MW floating projects have been constructed and so only developers with experience constructing fixed wind projects would be able to meet the criteria. The construction and installation of FOW technology has many synergies with the oil & gas industry, and the installation of a floating wind farm is fundamentally different to that of a fixed bottom wind farm. Also, many major oil and gas companies with extensive offshore experience are now looking to enter the floating offshore wind market but have not yet got construction experience. Our concern is that by applying a strict



pass/fail criteria, the assessment process would strongly bias the assessment process towards developers with fixed wind experience that may not have any track record in deploying floating wind or similar structures. This would prevent smaller floating wind developers with experience of delivering smaller scale projects meeting the criteria, even in partnership with other offshore construction companies. There is also a risk that this would reduce innovation in the Irish market as this tends to be driven by the smaller developers who are also designing their own technologies.

Suggested Text:

At least twelve months continuous experience at the construction stage of an offshore wind farm of greater than or equal to 100 MW, a floating wind farm above 5MW or a comparable offshore construction project which required the installation of large-scale floating structures where the construction stage is deemed to end at point of first generation of all or part of the offshore windfarm, or the start of formal operation.

- *The experience shall be within the 10 years immediately preceding the date of submission of the application documentation under the Maritime Area Planning Act 2021 Section 75(1) Maritime Area Consent Application Process*
- *The period of experience shall include the date upon which first generation of all or part of the windfarm was attained.*
- *Where not a wind farm, the experience shall include the date of formal operations beginning.*

1.2.2 Operational Phase Experience

Current Requirement; At least twelve months continuous experience at the operational stage of an offshore wind farm of greater than or equal to 100 MW where the operational stage is deemed to begin at point of first generation of all or part of the offshore windfarm and to end at date of commencement of decommissioning of the offshore windfarm.

- *The experience shall be within the 10 years immediately preceding the date of submission of the application documentation under the Maritime Area Planning Act 2021 Section 75(1) Maritime Area Consent Application Process*
- *The period of experience shall include any period within the operational life of a windfarm.*

Hexicon request that this requirement is removed. Our rationale is that the operation and maintenance approach for a floating wind farm is significantly different to the operational requirements for a fixed bottom wind farms and therefore this requirement is not translatable. As there are no FOW of this size, there are currently no developers that would be able to demonstrate experience operating a 100 MW+ FOW farm, and as we understand there would be no developers that would gain sufficient experience before 2023 when Phase 2 of the OREDPP is released. Therefore, only developers with experience in operating fixed bottom wind farms would currently be able to meet this criterion. However, by the time that projects awarded a MAC in this phase are due to be constructed, there will be numerous developers that would be able to meet these criteria.

Hexicon understand the criteria in relation to development and construction experience is requested to provide the government with reassurance that developers can develop and build a wind farm with minimal environmental and social risk, however once a project enters the commercial operation phase, the development is largely de-risked, and any environmental commitments or considerations associated with the operational phase are identified through the EIA process.

Therefore, Hexicon feel that operational offshore wind farm experience sets a high barrier and is not relevant as a qualification criterion for the MAC application. The requirement, if included in the final



the MAC assessment criteria is likely to exclude floating offshore wind bidders, and other companies with extensive relevant offshore experience, from entering into the OREDPPII process.



Section 2 - MAC Stakeholder Engagement (Consultation Document Ref; 3.2.1)

Consultation Question

Are there any other public interest considerations which the Department should consider at MAC application stage?

2.1 Rationale for Response

It is Hexicon's view that developers should be required to engage with stakeholders prior to the MAC application process and demonstrate through their applications that the area being applied for has been selected sensitively and has a high chance of being successful through the consenting process. Part of ensuring that sites have been selected sensitively is through effective stakeholder engagement prior to selecting a site.

The UK has seen many wind farm projects delayed during the consenting phase due to stakeholder opposition and a lack of early engagement. To reduce the likelihood of major opposition to the siting of MACs, Hexicon believe it would be prudent to require Phase 2 projects to demonstrate and be evaluated on the level of stakeholder engagement that had been undertaken to inform the MAC application, ideally through a measurable engagement methodology.

MAC applications are to consider the National Maritime Planning Framework, and within it broader impacts likely to be of key concerns to stakeholders. The impacts of a FOW development must be considered early on and demonstrated to civil society as contributing to an overall economic development (local supply chain, capacity building, skills transfers). If stakeholder engagement is not achieved early on, projects not supported by communities or stakeholders face a high risk of significant opposition resulting in delay, bad feeling in the communities or ultimately that consent is not granted which will impact decarbonisation timescales. A smooth consenting process is reliant on an area being broadly acceptable to stakeholders.

2.2 Recommendation

The Department and its Government support and promote sustainable development, however, this is only achievable through a holistic view of applications and should avoid MAC applications being assessed within a silo of pass/fail for technical and financial criteria alone.

For the ScotWind leasing process, applicants were required to submit delivery plans to demonstrate how they aimed to deliver and de-risk the consenting process. A large onus was placed on stakeholder engagement and early consideration of stakeholder views on site placement to de-risk the consenting process. Applicants were scored 1-3 based on the robustness of their answers. Therefore, applicants that had undertaken early stakeholder engagement, and could demonstrate that they had used the feedback in their applications were more likely to score higher and be awarded a lease. A similar approach could be considered here.

