

March 8th 2022

BREMORE IRELAND PORT RESPONSE TO PHASE TWO CONSULTATION

Bremore Ireland Port is a new facility being developed on the East coast of Ireland through a Public-Private-Partnership (PPP) between Drogheda Port Company and Ronan Group Real Estate (RGRE). The Bremore Ireland Port development has received support from the Department of Transport with the latest policy update announced in December 2021, which addressed the topic of "*Facilitation of Offshore Renewable Energy by Commercial Ports in Ireland*" and explicitly addressed the fact that the Drogheda Port development plans comprised "*large-scale infrastructure at a new east coast location which could also be an option for east coast deployments*".

The Bremore port facility is being specifically developed to target the needs of the offshore wind industry and therefore is an essential part of the supply chain, which once constructed will remove one of the major barriers to the practical delivery of offshore wind in Irish waters. The proponents of the Bremore project have placed significant effort to ensuring the Bremore facility will be fully operational by 2027 and therefore will be well placed to support both Phase One and Phase Two projects with key marshalling and staging infrastructure.

We recognize the purpose of this Phase Two consultation exercise is to solicit responses from industry to develop a preferred means of moving forward with a framework for identifying how Phase Two projects should be defined or classified. We also recognize that the purpose of Phase Two is essentially a "stop gap" measure in advance of a plan-led centralized offshore wind delivery system being implemented – a system under which Phase Three projects will be delivered. Phase Two is therefore responsible for delivering the required electricity needed from offshore wind sources before 2030, after which Phase Three will become the new delivery model. The 2030 targets of at least 5GW of offshore wind energy generation must be achieved through a combination of Phase One and Phase Two projects, after attrition. In order to meet these targets, we feel that the Phase Two framework needs to ensure several key principals are addressed within the specific Terms and Conditions of the system:

- Grid Availability is Key: Offshore wind is needed to meet the rising electricity demand in the country, therefore offshore wind projects need to be located in parts of the country where the infrastructure upgrades are planned, thereby facilitating rapid grid connection. This is well captured in the Shaping our Electricity Future document and therefore we are fully supportive of the suggestion by DECC to focus on the East and South East coasts where grid access is most likely in the near term. Bremore Port is well located geographically to ensure that such Phase Two projects will have a state of the art construction port facility on the East coast that is being custom built to suit the needs of the offshore wind industry.

- **Deliverability is Key:** As an industry we need certainty with respect to timelines and a clear understanding of what capacity will be coming online at what points in time. Bremore Port have built a business case around offshore wind being developed within a certain timeline that is aligned with the 2030 targets. We need a Phase Two system that reduces uncertainty to give confidence to the wider industry that investment in such critical port infrastructure is a sound business case. Therefore, we propose that Phase Two projects should have to demonstrate deliverability such that the overall construction dates are fairly well defined and sufficiently ahead of 2030 to enable grid connection by the target date. There should be an emphasis in the Phase Two criteria on the works completed to date by the developers to enable potential Phase Two projects to leverage investment spent at risk on critical path items in an effort to reduce the overall project programme, demonstrating deliverability pre-2030. The more clarity that the supply chain and key infrastructure providers, such as Bremore Port, can secure in relation to the construction timelines for offshore wind projects, the easier it is to align the build out programme for the Port facilities and to ensure they are in place ahead of when they are needed.
- **Strong Developer Track Record is Key:** Noting that we need to give the supply chain confidence in the deliverability of offshore wind projects, it is essential that we place significant emphasis in Phase Two on the track record of offshore wind developers in constructing offshore wind projects in other jurisdictions. There is no substitute for having “been there and done it”. The supply chain needs the certainty on the timelines in order to invest in key infrastructure. Bremore Port is committing significant investment at risk and therefore we need to discourage speculative bidding in Phase Two from developers with limited to no track in offshore wind delivery. Strong developer track record will minimize timeline slippage and support the industry achieving its energy targets.
- **Proven Technology is Key:** Again, the supply chain needs certainty on the timelines for delivering Phase Two, we also need to understand the type of projects that will be delivered to ensure that the appropriate infrastructure is in place to support these projects. Bremore Port is being developed with a primary focused on supporting fixed bottom offshore wind projects because floating is simply not cost effective at this moment in time and the level of technology maturity is such that it does not make sense to accommodate floating projects before 2030 when fixed bottom projects will be cheaper, faster, less risk and with a clearer set of supply chain requirements. Phase Two needs to focus on proven fixed bottom technology. (Note, we are highly supportive of the long-term potential for floating but this needs to be within Phase Three). The concept engineering for the infrastructure at Bremore Port is based on supporting fixed bottom offshore wind pre-2030.
- **Focused Resource Allocation is Key:** We see the lack of resources on the side of DECC, DHLGH, MARA and ABP as being a key risk. To reduce the pressure on the State in terms of reviewing and approving MAC applications, we strongly support a Phased system which allows projects that do not meet the key criteria outlined above to be vetoed early such that they do not suck up significant resources within the system. A strong message needs to be established to discourage speculative bidding that will detract from the more advanced and credible projects along the East coast that can be delivered in the near term without the risk of “taking a punt” on a developer without a proven track record. The State resources need to be focused on accelerating projects that can be delivered pre-2030.

Recognizing that the Phase Two projects need to be delivered pre-2030, we feel that the key criteria outlined above will encourage projects along the east coast to continue fast-tracking their development plans, leading to projects being delivered within the required timeframe. The key

message that we would like to reiterate is that Bremore Ireland Port will have the critical port infrastructure in place to support these projects by 2027 and we would welcome engagement from the industry on how we can work together to ensure our renewable targets are achieved.

Recognising that there is value and synergies from energy generated in proximity to Bremore (See Map A and B), a study completed by EY in 2021 examined the potential for a Green Hydrogen facility at the port. The analysis identified multiple demands for the Hydrogen outputs, including within the port as energy and fuels for plant, HGVs, and vessels. The initial proposition is for a 62.5 MW plant that can produce 30,000 kg of hydrogen per day in full production. The demand analysis indicates that this will contribute to the growing needs of the regional economy. Further demand from the national gas network post 2035 will make a scaling to 1 GW feasible, given that the national gas interconnector point is on the Bremore port lands.

