

26th February 2024

Re: Submission to the *ORE* Future Frameworks Public Consultation

Dear Sir/Madam,

AstonECO welcomes the opportunity to respond to this overarching framework that will be vital to Ireland's success in Offshore Renewable Energy (ORE). AstonECO has worked with the wind industry in Ireland and internationally for almost two decades. At present, we are undertaking a research, develop and demonstrate programme - part funded by the Sustainable Energy Authority of Ireland (SEAI), and peer reviewed by the University of Galway - that aims to bridge the gap between developers and communities for onshore and offshore wind projects, in order to help Ireland meet its renewable energy targets.

This submission focuses in on two of your questions:

1(a). Has this section adequately identified the general key priorities for ORE delivery in Ireland? Are there additional priorities that should be integrated into the holistic, plan-led approach?, and

1(f). What additional capacities and responsibilities should be held by industry in the context of the plan-led approach?

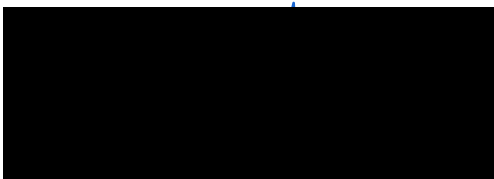
As stated by your Future Framework draft, for offshore wind energy generation, communities will play an important role in realising the value that lies off our coastlines through hosting the required infrastructure. As clearly already recognised in its *foreword* and *introduction*, it is imperative that the final Framework delivers on this. To do so it will need to respond to the need to involve both directly and indirectly impacted communities in our offshore planning.

We acknowledge the work your Department, amongst others, has done to bring Ireland to this point, where a framework for our future offshore renewable energy development is possible. As currently drafted, however, AstonECO has concerns that the necessary measures to force community engagement of sufficient quality to meet the policy's aims are weak. Based on a clear-eyed examination of the reality on the ground, the ability of the Framework to deliver on its stated goals regarding community, and indeed in general, will need to be significantly strengthened. Only this way will developers, the State and host communities all benefit from the Framework's strong intentions. We raise four recommendations which we believe must be incorporated into this document, and ultimately into the heart of the planned expansion.

1. To enable communities to more naturally come onboard, we must make community readiness and resilience one of the key goals of the energy transition.

2. We must ensure we treat community engagement with the same level of professionalism and resources that we use for financial, technical and permitting success.
3. While the financial benefits associated with this expansion must be shared equitably across Ireland in forms such as the Community Benefit Fund, this must be matched much earlier in the project creation process with good quality engagement to understand and address all local concerns so as to prevent splitting communities, and the creation of significant project opposition.
4. Combine the above three recommendations into an overarching goal to successfully integrate renewable energy initiatives into community local sustainable development - a request we are hearing from communities throughout Ireland across both onshore and offshore.

We elaborate on these four points in the following text. I hope that you consider the recommendations we have put forward, and we would welcome an opportunity for bilateral engagement on this matter. This is something we are already committed to in our work for the Earning Local Support Academy - the result of the SEAI funded work mentioned above.



AstonECO Management.

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Introduction

AstonECO welcomes the National ambition of 5 GW of Offshore Renewable Energy (ORE) by 2030, 20 GW by 2040; and at least 37GW in total by 2050, together with the tone of this Future Framework document as captured in the Minister's words in its *Foreword*:

*"The abundance of our significant natural resources means that with the **right ambition, focus and collaborative approach**, we can have our own secure supply of clean, renewable and affordable energy. At the same time developing indigenous green growth and taking full advantage of the emerging export market opportunities."*

*"This potential can only be achieved with **national ambition** and with a **strategic long-term approach**. This Future Framework Policy Statement on Offshore Renewable Energy addresses both of those things."*

*"Offshore renewable energy is a dynamic, fast-paced and evolving landscape... We are setting out our Future Framework now so that **we will be ready, along with our local communities and business partners**, for the future of offshore renewable energy."*

The ambition in the Framework holds massive potential for success, especially this final quote from the Minister. To ensure the developer-community team is present on the ground to be able to deliver on this is the focus of this submission. We advocate for a stronger capture of this collaborative ambition throughout the body of the Framework. If the Framework is clear enough, then the required action will follow. However, if each developer feels that this work is not obligatory for all players, then they will have internal resistance to its implementation. This in turn will mean that the meaningful community engagement to enable our national climate targets to be reached will not be undertaken in time, and our targets will be missed.

The Importance of This Framework

This Framework comes at a critical time in Ireland's path to harnessing the resources that are so abundant. AstonECO acknowledges the overall, cohesive plan being put in place, summarised by the Minister's quote;

"The Future Framework Policy Statement is part of a suite of policy initiatives that has been launched by this Government and co-ordinated by my Department through the Offshore Wind Delivery Taskforce."

However, if this policy is to be as effective as it aims to be, we must consider all aspects of the ORE expansion - and ensure that the efforts to earn social acceptance are effective. By

taking the learnings that Ireland's wind sector has built from onshore projects, we can make the necessary changes to our strategy and achieve our goals. While the 5 reports being produced by AFRY & BVG Associates cover important workstreams, we are concerned about the lack of full incorporation of meaningful community engagement in this process.

The Draft Framework suggests that minimum community engagement standards - including the internationally recognised principles of inclusiveness, materiality and responsiveness - are adopted with sentences such as the one below are used:

“As part of the development of the DMAP (Designated Maritime Area Plan) process we will consult widely with local communities around the country to hear their views on the development of the local areas and activities that they know best.”

This will be welcomed. However, from experience and observation on the ground, we believe it might be prudent to be a bit more questioning of just how good we are in this regard. Communities will want to know that they are being listened to and that the projects are designed in such a way as to synergistically support *their* local development, and not just that of the developer. Statements, such as the below, show the intent of this Framework to indeed carry out quality engagement:

“We will continue and complete this South Coast DMAP process in 2024. This is what a robust consultation process looks like.”

“It means taking the time to listen to, and learn from, the local knowledge of coastal areas. This is the standard we have set for ourselves, and we will maintain that standard for future DMAPs to support development, protect biodiversity and enhance communities. We are planning for a robust future renewable industry that will deliver enormous benefits to communities around the country. The benefits of our offshore renewable industry will spread out from the local communities into surrounding counties, ultimately benefiting the whole country.”

For the above to be seen as reality on the ground, the future Framework will need to make this far more central to its core commitment than it currently is. Also, given the lack of internal expertise, significant new proficiencies and capacity will need to be mobilised to bridge the developer - community gap. How this is to be achieved, and what it needs to achieve, needs to be spelt out concretely. Community engagement is not something that is achieved through a small number of finite events, but rather an integrated part of everyday decision-making (i.e. the community is at the table). Ireland's ORE rollout has the opportunity to take learnings from the enormous amount of knowledge gathered in other sectors, such as the extractive industry. There, through much trial and error, the industry eventually concluded that in order to be successful, community engagement at each step of project conception, and project design, was necessary. Incorporating this feedback into

design briefs, and harnessing community-developer synergies has become best practice for the extractive industry - why should the wind industry be any different¹?

Furthermore, when we say that *“We will proactively engage with communities...”*, the extractive industry learnt that this needs to be done based on the communities’ priorities rather than agendas set by us. A key example of this in the Framework follows from the above quote, determining the need to consult communities *“...on future technologies such as deepwater fixed wind, floating wind and wave.”* Are we sure communities will respond to this, or are there bigger concerns in their eyes that we need to address first? This is the focus of Recommendation #4.

Recommendations

It is clear that most people in Ireland are aware of the huge potential and opportunity linked to the harnessing of Ireland’s wind. This statement in the Foreword captures this essence: *“As a country, we can deliver on our long-term climate goals, ensure the long-term energy security of our country, and develop green industrial opportunities for the abundant energy resources we have off our coasts.”*

However, it is essential to include the need to build *long-term social cohesion and community vibrancy* into this sentence. All indicators suggest that failing to do so would lead to a lack of follow up with the appropriate actions, which will in turn lead people into opposition to offshore wind in the same way we have experienced it for onshore.

Through ensuring communities have the support and resources to play an active role in the offshore wind development planning for the decisions that impact them, only then will the Minister’s following sentence ring true:

“This Future Framework is our plan for the future. We will be ready for that future by working across Government and alongside local communities, Irish industry, and international energy Partners.”

As such, we propose the following four recommendations.

1. Making community readiness and resilience one of the key goals of the energy transition.

¹ While the extractive industry may have bigger local impacts, both industries imply negative externalities/ missed local opportunities, and are faced with procedural and distributional justice issues.

The framework states three key reasons for sustainably developing Ireland's considerable offshore resources:

1. *Decarbonising the Irish economy in line with legally binding national and international climate ambitions;*
 2. *Ensuring long-term energy security; and*
 3. *Developing green industrial opportunities for energy utilisation and for export markets.*
- Environmental considerations and protections are also of the utmost priority during the development of new ORE projects in Ireland's maritime area. Environmental concerns are at the forefront of the plan-led approach, from project planning to project decommissioning."*

Yet, if we read this in light of the Minister's comments highlighted above, we see the need to include the local community into the core of this Framework also. There is no stronger way to start this than by making it a key reason for the sustainable development of ORE. As such, we propose the following additions;

"The key reasons for sustainably developing Ireland's considerable offshore resources are fivefold:

1. Decarbonising the Irish economy in line with legally binding national and international climate ambitions;
2. Ensuring long-term energy security;
3. Developing green industrial opportunities for energy utilisation and for export markets;
4. Ensuring a healthy marine and coastal environment; and
5. Building the capacity of our coastal communities to be socially and economically resilient during these times facing unprecedented change.

These additions take the original text from being reasons as to why developing ORE is important, to make it why **sustainably** developing ORE is important. This is a vital beneficial shift for Ireland to capture through this framework. It will help ensure that community engagement is strategically integrated into projects at a sufficiently early and meaningful stage.

Some will argue that suggested points 4 and 5 above should even be points 1 and 2, thereby showing that the concern for our coastal communities and environment is our top priority. This would strengthen the ambition of ensuring the host communities' concerns are duly engaged with in a timely manner.

2. To help deliver on the above, we must ensure we treat community engagement with the same level of professionalism and resources that we use for financial, technical and permitting success.

AstonECO, through its broad experience in the onshore wind sector in Ireland, has seen the effects of vague policy wording being turned into a low minimum standard for engagement, and communities feeling disenfranchised as a result. This became a seed for opposition growth. We urge the Department to strive for a more ambitious result of engagement, by ensuring effective standards are agreed from the outset. If the industry knows they are legally bound to reach a given engagement standard, then they will do so. If not, they won't. Nor will the resulting input from communities make it into the engineers' design briefs so that local synergies can be optimised. For the example statement below, what minimum standards will the framework ensure for the engagement with coastal communities to be meaningful?

*“The use of sub-national forward maritime spatial planning such as DMAPs, will ensure that future developments in Ireland’s maritime area take place in a managed, strategic and sustainable way. **It will provide comprehensive opportunities for public and stakeholder engagement, and most importantly for local coastal communities.**”*

The standard used will not only have to include public engagement and statutory consultation such as in the quote below;

“Public engagement and statutory consultation will ensure that future development of ORE takes place with consideration of other marine activities and usages, including fishing, aquaculture, marine tourism and marine leisure, which are vital amenities and sources of income and employment for many coastal communities.” (page 6)

but also a level of quality and timely community-wide deliberation that will enable those living in a community to see how offshore renewables can play a vital and constructive role in the communities' sustainable development.

This framework is an ideal opportunity to recognise that the path to date, while successful in turbine rollout, has led to many communities' voices being unheard, causing fear and anger, and ultimately opposition. Taking these learnings into the future through this framework will mark an important shift in our approach, which will benefit all people, especially those who are ultimately answerable to these communities.

To ensure best practices are used, we recommend the inclusion of the OECD's due diligence for meaningful engagement² or AA1000's international stakeholder engagement

²<https://www.oecd.org/publications/oecd-due-diligence-guidance-for-meaningful-stakeholder-engagem-ent-in-the-extractive-sector-9789264252462-en.htm>

standards³, building on the ORESS Community Benefit Fund Rulebook⁴, but in a more concrete and monitored way. Developers must use these standards and should be held accountable when they fail to do so.

3. While the financial benefits associated with this expansion must be shared equitably across Ireland in forms such as the Community Benefit Fund, this must be matched much earlier in the project creation process with good quality engagement to understand and address all local concerns so as to prevent splitting communities.

To ensure communities are considered a top priority in this ORE expansion, and valuing engagement with them as much as other facets of the wind industry - we must also acknowledge the learnings to date associated with the distribution of financial benefits.

The Community Benefit Fund, while accepted by some communities, has given rise to two major issues in many others. The first is that money injected into communities without the adequate social cohesion and local vision leads to splits that further damages the community fabric. While the ORESS CBF Rulebook outlines some attempts to prevent this, AstonECO does not believe the necessary supports are in place for this to be successful. Genuine local sustainable development plans must be put in place - through quality community engagement in line recommendation #2 - before funds are introduced. The question the communities should be asking themselves is “where do we find the money for this?” and not “what should we do with all this money?”. The former ensures cohesive, positive investment of the CBF, while the latter leads to a “smash and grab” approach.

The second issue arises with the CBF when developers and government alike do not recognise the local negative externalities or lost opportunities associated with how the project has been designed. Putting money on the table before these issues are recognised and resolved is often seen as something akin to a hush-money⁵.

The idea inherent in the CBF to provide resources to the community is undeniably beneficial. However, resources and commitment are required to support communities to have a stronger voice at the decision-making table and must be made available before community splits occur. Pouring money on top of a community split only aggravates the situation. This will eventually lead to a failure in the CBF’s positive intentions, and working against the ORE expansion by fostering opposition.

³ <https://www.accountability.org/standards/aa1000-stakeholder-engagement-standard/>

⁴ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/244348/0dece698-ab8e-459f-b885-3cc427406647.pdf#page=null>

⁵ <https://www.bbc.com/news/uk-wales-57931760>

4. Combine the above three recommendations into an overarching goal to successfully integrate renewable energy initiatives into community local sustainable development - a request we are hearing from communities throughout Ireland across both onshore and offshore.

The framework for ORE expansion, in its current form, may be challenging for communities to reconcile with their local sustainable development plans. Without a seat at the table, communities often feel that these types of frameworks and plans are making decisions that greatly impact them, yet their timely and robust local input is missing. They deem this a lack of meaningful engagement, a lack that leads to distrust and resistance.

Developers, authorities, and communities too often talk very different languages. What may seem important to a developer may not be to a community, and vice versa. Unfortunately, at present, the community perspective is often being omitted. In order to bring them on board, we must engage with them on issues that are of importance to them. It's about asking the question of how these renewable energy initiatives can be integrated with community visions, rather than the other way around.

AstonECO also acknowledges the difficulty in bringing this more robust engagement to bear. Communities often appear scattered and without a unified voice. However, it is also within our nation's grasp to use the development of ORE to build these communities and their voice. This can be attained through supporting each host community to first form its own sustainable development vision. The Government already has a strategy in place to enable this to happen, [Our Rural Future](#), and it has resources such as the EU LEADER programme with its sister programmes for more urban areas. To be effective, this will have to be synergistically linked to the capacity building of future host communities for renewable energy. This will take an effort to achieve, and more community-developer bridge building skills on the ground. It will therefore need inter-ministerial level ambition.

It is strongly recommended that a task force be thoughtfully formed to examine how these intergovernmental synergies could be activated. AstonECO is currently researching, developing and demonstrating what is required to earn local support for wind energy in Ireland and are starting a partnership process between local communities, developers and third parties to create the Earning Local Support Academy (ELSA). While this is proving successful, it is small-scale and localised. The learnings from this exercise, being financially supported 80% by the Sustainable Energy Authority of Ireland (SEAI), are available to help the above should DECC have the appetite.

This would help deliver on specified objectives in the framework such as:

“With the adoption of a plan-led approach to ORE comes a government responsibility to set forth a robust pathway for the achievement of Ireland’s ambitious targets out to 2040 and

2050. *The purpose of the ORE Future Framework is to set out the future of ORE development in Ireland from 2030 in a manner which will **maximise environmental and social welfare**. The ORE Future Framework will be delivered through collaboration between State, industry and local communities.” (page 7)*

This train of thought continues with:

“The Future Framework policy statement is aligned with and complementary to, Ireland’s existing climate, renewable energy and ORE policy and legislative frameworks.”

Is there not much synergy to be gained, and little to be lost, by referencing “Our Rural Future” and other community development-related Government policy here? Before going on to state that:

“It further complements Government objectives contained within the pending National Industrial Strategy and the Offshore Transmission Strategy... As such, the Future Framework sets out a number of key actions, future directions and intergovernmental dependencies that will be addressed through subsequent policy to develop and initiate the long-term, plan-led approach to Ireland’s ORE future.”

Ultimately we see too important a crossover between this Framework and the development of our Communities’ visions for it to be ignored. A taskforce that links the two, and ensures engagement is held to a high standard and incorporated into the core of both is vital, and assists the Department in its objectives. The aim is to create an ORE environment where developers and host communities are synergistically working towards shared goals with the highest local priority, thereby ensuring social acceptance.

Conclusion

Many people in both the wind industry and communities agree on the need for a considerable building out of the social acceptance pillar for offshore wind in Ireland. Commitments to ‘robust engagement’ without the same rigour that goes into financial, technical, environmental and permitting pillars will not deliver. The four recommendations provided show an insight into some of the issues that will benefit from deeper consideration. Ultimately, if an efficient expansion is to be achieved, then social cohesion is key in the success of our ORE expansion. As such, it must be a core pillar of any policy linked to offshore renewable energy. If done properly, this policy-led approach by the government will enable Ireland to harness the resources off the coast in cooperation with communities. It’s vital the government step up to implement policies that developers must follow so as to embrace our communities, rather than pay lip service to them, or simply treat them as risks.

Once again, we would welcome the opportunity to engage bilaterally with your Department on the above issues and recommendations, should you find this useful.