

Future Framework Consultation

Offshore Environment and Future Development
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Emailed: FutureFrameworkpublicconsultation@decc.gov.ie
and via the CiviQ online consultation platform

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Emerald and Western Star are proposed floating offshore wind farm projects off the south and west coasts of Ireland respectively, each being developed by joint-ventures between EDF Renewables Ireland (EDFR Ire) and Simply Blue Group (SBG).

EDFR Ire is part of one of the world's largest electricity companies and our investment and innovation in renewable energy projects is bringing down costs for consumers and delivering significant benefits for communities. EDFR Ire's team has a wealth of experience in bringing complex development projects to fruition, across onshore and offshore wind, solar PV and battery storage technology, and is supported by more than 4,500 colleagues globally. In addition, EDFR has been supporting the development of floating wind technology through the recent delivery of the Provence Grand Large project, a 24MW pilot wind farm in the Mediterranean.

SBG, headquartered in Cork, Ireland, is a leading blue economy developer focused on replacing fossil fuels with clean ocean energy. It develops pioneering blue economy projects – offshore wind, e-Fuels, wave energy, and low-impact aquaculture – all in harmony with the oceans. The company has a pipeline of over 10GW of offshore wind projects across the globe, mainly floating developments. Simply Blue is committed to creating new economic opportunities for coastal communities, and developing projects that co-exist with sustainable fisheries and marine biodiversity.

The Emerald and Western Star teams welcome the opportunity to jointly respond to the Department of the Environment, Climate and Communications (DECC) consultation on the offshore renewable energy (ORE) Future Framework Policy Statement (Future Framework). We would like to note that **we have contributed to, and are supportive of, the consultation response submitted by Wind Energy Ireland (WEI), the Marine Renewables Industry Association (MRIA) and the Shannon Estuary Task Force (SETF)**. EDFR Ire have also submitted a separate response to the consultation. **This joint response is intended to respond to specific points in the consultation relevant to our floating offshore wind projects.**

We have provided a detailed response below, and trust that the Department will take these messages on board in a timely manner, given the limited window of opportunity to influence the Future Framework in advance of the proposed launch in Bilbao next month. We urge DECC to consider publishing a high-level action plan in

March which is agreed upon by both Government and industry, taking the following three key points into consideration: -

1. **Commit to getting DMAPs done for all coastal areas by end of 2025.** Without this we will not make the 2040 target of 20GW. The piecemeal approach seen to date with respect to specific Designated Maritime Areas Plans (DMAPs) linked to relatively limited capacity is not a sustainable model and needs to be transitioned to meet both the ambition of the timelines recently published by North Seas Energy Cooperation (NSEC) and to maintain current and attract future investment.
2. **Provide a clear statement of the intent to kick-start floating offshore wind, by including a timeline for auctions, starting with auctions for seabed leases, and clarity on plans for one or more pre-commercial demonstrators** as a stepping stone to full commercial arrays (aiming for the first demonstrators to be **400-500MW supported by a floating pot in ORESS**).
3. **Focus on setting out the plan for delivering 20GW of offshore wind by 2040 and 37GW by 2050, through effective partnership.** The framework is not a plan. A partnership approach with Industry to deliver a plan is essential. The current process of designing policy in isolation and then seeking feedback is suboptimal. In the last two years, two key pieces of policy (Phase 2 and OREDP II) have been stymied by this approach. A new model must be considered where government and industry work in tandem to deliver the ambition for 2040. This has been successfully implemented in Scotland where industry agreed to work with the Scottish Government in the development and delivery of a collaborative framework for offshore wind.

The Future Framework provides a timely opportunity to resolve uncertainties and boost investment confidence, but only if the final version sets out a holistic roadmap which links together the arrangements for these processes.

In conclusion, we would like to thank DECC for the opportunity to engage on this matter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact George.Daniel@edfre.uk.

Yours sincerely,

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Emerald and Western Star

Emerald Offshore Wind Limited and Western Star Wind Limited Submission to DECC on the Future Framework Consultation

A number of questions have been posed for some of the sections of the FF Consultation; however, these do not cover all the sections in the consultation document. Therefore, our response has been structured as follows:

- Key feedback on the Future Framework.
- Response to the specific questions provided in the Future Framework (Consultation Response Form).

Key Feedback on the Future Framework

Timelines

The ORE supply chain is now operating on a truly global scale, where competition is already high. With other neighbouring markets having already undertaken leasing rounds and developed project pipelines to meet their respective deployment targets, Ireland is in competition with these markets for access to turbines, towers, ports, construction sites, and skills. **We are therefore disappointed that, rather than setting out a comprehensive plan or roadmap for how the 20GW by 2040 target (and ultimately 37GW for 2050) will be achieved, the Future Framework merely lists a suite of disparate actions and ongoing workstreams being progressed through the Government's Offshore Wind Delivery Taskforce.** This provides no further clarity regarding DMAPs, future leasing (i.e. Maritime Area Consent), development consent, route to market or grid arrangements to achieve 20GW of deployment by 2040.

The Future Framework Policy Statement begins with the following:

"Ireland has significant potential for the development of offshore renewable energy, including wind, wave and tidal energy that can aid in the delivery of our long - term climate goals. Ambitious targets have been set for the delivery of Offshore Renewable Energy (ORE) in Ireland's exclusive economic zone: 20GW by 2040; and at least 37 GW in total by 2050".

If the above is the ambition, the Future Framework lacks a plan or commitment to achieve this ambition and is **far too high level and vague**. If we want to deliver Ireland's offshore renewable energy potential and meet our 2040 and 2050 targets, we need to start developing floating offshore wind (FLOW) now, which according to DECC the 2040 and 2050 targets cannot be achieved without it. For this **we need a timeline and comprehensive roadmap for how the 20GW by 2040 target (and ultimately 37GW for 2050) will be achieved.**

DMAPs

Wind farms take at a minimum of 8-10 years from Maritime Area Consent (MAC) to complete construction (as recently reiterated by Laura Brien CEO of MARA in the Annual Wind Energy Conference). If we want these projects completed in the 2030s, **we need designated areas plan (DMAPs) in 2025.** As per the recently published NSEC future offshore auctions and associated construction timelines, Ireland's offshore capacity from Phase 1, Phase 2 and beyond, is all expected to be delivered post-2030. The recent project programme timeline developed by WEI as part of their submission to the ORESS 2 auction design consultation, had the

ORESS 2.1 project delivering by 2033/34 should the auction take place in 2024. Therefore, if Ireland will only be delivering 5GW of offshore wind capacity by 2033/34, then we only have seven years to deliver another 15GW of capacity to achieve the Government's 20 GW target by 2040. This will not be possible without a **proper plan in place which enables a high level of offshore wind capacity to continuously move through the system and which gives confidence and certainty to the developer and supply chain communities now, and not overwhelm the planning system, supply chain and coastal communities in 2040.**

We would urge that clarity is needed as soon as possible as to how the marine spatial elements will operate post 2030 in the absence of the National Spatial Strategy (formerly OREDPII) and we would stress that **the future DMAP roadmap must be a government priority.** Clarity on this is vital to deliver on Ireland's offshore wind targets, implement an effective plan-led approach, and to achieve future auction timelines as set out via the NSEC. Therefore, the planned approach for DMAPs, with associated and realistic auction timelines clearly outlined to at least 2040, should be set out as soon as possible.

The DMAP process should be a desk-based exercise utilising available data with areas appropriately sized to allow for site refinement following site award. This would be in keeping with DECC's current South Coast DMAP methodology, where they have noted that the ORESS 2.1 auction site will be kept large enough to account for ground conditions data being unavailable at time of auction.

Once a DMAP has been adopted by the Government and environmentally assessed, it should be the responsibility of the industry, who are experts in their field, to identify the most suitable sub areas/sites for offshore wind farms via competitive seabed lease process. This promotes the development of offshore wind farms in the most suitable areas, at lowest cost, and increases the chances of such wind farms progressing through to operational stage.

Scaling Up

We support the action in the Future Framework to consider a site specifically for FLOW but expected significant more detailed and ambitious actions. **Action 1 is to "conduct a study to assess the potential to deploy floating offshore wind". This is a considerable step backward** from the commitments in the 2023 Phase 2 policy paper which targeted 2GW of FLOW capacity in the South and West Coasts, and the potential for FLOW in Ireland detailed in the Draft OREDP II. To maintain current and attract future investment in Ireland, **the Future Framework needs to be far more ambitious than just assessing the potential.**

Action 2 is to "*investigate feasibility of a floating offshore wind demonstrator site*". Ireland's ORE targets cannot be achieved with fixed wind alone. **There are numerous FLOW demonstrator projects in development and operation globally. Therefore, this cannot be another small-scale demonstrator site as this would bring limited benefit to Ireland, particularly as commercial developments such as ScotWind and Round 5 in the Celtic Sea¹ are on similar timelines to the Future Framework, leaving little appeal to such a site in Ireland for both developers and the supply chain.** Small demonstrator projects are the most expensive type of project to consumers due to economies of scale, as is apparent from AR5 and AR6 in the UK. Ireland should, instead, look to capitalise on FLOW development to date and offer a landscape where developers and supply chain can progress to commercial scale projects.

¹ The Celtic Sea Round 5 projects will be constructing FLOW projects of up to 1.5GW each in a similar (or sooner) timeframe to Ireland (leasing award is planned for 2025, thus construction should be underway by the early 2030s), and the ScotWind FLOW projects are mostly aiming for construction commencing in the late 2020s with capacity ranging from 495MW to 3.6GW (<https://www.offshorewindscotland.org.uk/the-offshore-wind-market-in-scotland/floating-wind-in-scotland/>)

We need a pre-commercial demonstrator as a stepping stone to full commercial arrays, aiming for the first demonstrators to be 400-500MW, supported by ORESS. Grid will be a key enabler for these projects. Anything less than this will not attract attention from the market, particularly for delivery in the early-mid 2030s.

ORESS and Route to Market

The Future Framework needs to consider the controls which Ireland has, or needs to have, to reduce the price of delivering offshore wind, while maintaining a competitive and thriving supply chain. It is important that the drive to reduce the cost of electricity does not become a race to the bottom as this could exacerbate supply chain challenges which are already evident in the market. The EU and other markets are now advocating **non-Price Criteria in auctions** as a means of combating these issues. This should be considered in **future auction design**.

It must be noted that if we focus solely on exporting offshore wind by interconnection, then Ireland's competition becomes our wind versus more established markets. For Ireland as a net exporter, we need our marginal price to be cheaper than the marginal price in other jurisdictions (including France, the UK, Spain, Portugal, Germany, Belgium, and the Netherlands). Therefore, **prior to exporting our power, we should be looking to maximise the use of that power domestically through creating value products and services using our wind (e.g. support for data centres).** We also need a planned approach to route to market for export, including timelines for delivery of key strategic infrastructure such as interconnectors and energy parks.

MACs

As discussed above, wind farms take at a minimum of 8-10 years from MAC to completed construction. If we want these projects completed in the 2030s, **Ireland needs to issue MACs no later than 2026 to kick-start FLOW in Ireland, so we can meet our 2040 targets.**

We note that **MARA's recently published Levy Framework** has the same levies as Phase 1 developments for offshore windfarms within the outer maritime area (i.e., beyond 3 nm), specifically €20,000 per km² per year². **We request for a work stream to be developed as part of the Future Framework, to review the Levy to make it fit-for-purpose for the floating sector.** The Phase 1 projects had already completed site investigations and significant design progression and, as such, applied for smaller, array sized areas at the MAC stage. For the Future Framework projects, site development rights will be gained at a much earlier stage in the project process, therefore, significant MAC fees would not reflect the risk profile of projects.

Development areas associated with a plan-led regime will be inherently larger and the associated large levies will ultimately be passed onto the consumer in higher bids to offtake auctions. The MAC fee per MW should be consistent across all phases as the density will vary with conditions and circumstances. Thus, we advise adjusting the MAC levies for the plan-led regime to be broadly in line with Phase 1 on a per MW basis. An alternative option would be a stepped approach to MAC levies, whereby they are revised as certain development milestones are reached.

² <https://www.maritimeregulator.ie/mac-levy-framework/>

Data

We would like to raise the importance of obtaining the right data sets at the right time in development. DECC confirmed at the ORESS 2.1 workshop on 15 January 2024 that, in addition to the recent data procurement exercise for all areas of Irish waters, the Government will commission their own biological and metocean surveys in support of future ORE development. We welcome the Irish Government's strategy to widen data procurement and commission their own surveys in support of future phases, however it is not clear where the planned programme of environmental and metocean surveys fit into the Future Framework. **Details on what the survey campaigns entail are requested and consultation with industry on defining survey scopes advised.**

Plan-led roles and Responsibilities

The Future Farmwork states:

"from 2030 onwards, all ORE development in Ireland will be led by the State including through the establishment of DMAPs, project auctions such as ORESS and other routes to market, grid connections, planning permission, environmental considerations, grid build-out and connections, increasing domestic demand opportunities, developing export markets, and establishing a financial return to the state and local communities. Government will play an increasingly involved role during pre-construction stage ORE development, including through the oversight and commissioning of marine surveys and environmental assessments, and providing guidance on project design envelopes."

The above statement (and comments on this from DECC representative at recent conferences) is again adding uncertainty to this industry. We do not believe it is appropriate for the Government to take on the role of identifying, designing and consenting of projects, as this would appear to go beyond the mandate of the Government as set out under the MAP Act. We agree with the analysis in workstream 4 of the economic analysis which accompanies the Future Framework, with regards to **the numerous disadvantages associated with even more Government involvement, including poor timelines, risk to delivery, risk to investment, resourcing and funding constraints, and bottlenecks.** The analysis goes on to examine the advantages and disadvantages of pursuing two different models of a plan-led regime – a hybrid model, and a fully integrated model. It is found that **the extension of the State's responsibility to full project design, permitting and delivery of array cables is likely to yield little value. It is more likely to lead to inefficiencies in design and delivery, and make Ireland a less attractive market for investment due to the additional project risk and complexities it introduces.** As demonstrated through the examination of best practice in international markets carried out within the analysis, it is better to leave detailed wind farm design and array cables to industry. This is what industry is comfortable with and experienced in delivering.

The focus should be on DMAPs, to deliver a pipeline of projects, which can be progressed through consenting by industry; to meet the 20GW target.

Summary of Our Asks

To maintain current and attract future investment in Ireland, the final Future Framework needs:

- Timelines for DMAPs.

- A commitment on getting DMAPs completed for the south and west coast by the end of 2025; utilising existing datasets, along the lines of what was previously planned for OREDP II, and what has been done for the south coast DMAP.
- Kick-start FLOW in Ireland now, with a commitment for MACs for FLOW in 2026, so we can meet our 2040 targets.
- Take industry advice through the Future Framework on board, with regards to demonstrator projects for FLOW i.e. a pre-commercial demonstrator as a stepping stone to full commercial arrays, aiming for **the first demonstrators to be 400-500MW, supported by a pot for FLOW in ORESS.**


The absence of a holistic roadmap to achieve 20GW deployment within the Future Framework risks perpetuating uncertainties experienced in recent years regarding how plan-led site selection, allocation of seabed exclusivity, award of grid capacity, development consenting and securing a viable route to market (i.e. ORESS successor) will all be integrated with each other. The Future Framework provides a timely opportunity to resolve these uncertainties and boost investment confidence, but only if the final version sets out a holistic roadmap which links together the arrangements for these processes.

Future Framework Consultation Response Form

To robustly respond to some of the detailed questions, more time should have been provided in this consultation, and more importantly, sufficient time for DECC to incorporate the responses into the final Future Framework. Based on the time provided the following is our response to the specific questions provided in the Future Framework (Consultation Response Form).

No.	Question and Response
1(a).	<p>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?</p> <p>Response: The number one key priority for ORE delivery is getting DMAPs completed for the remaining Irish coast, and this is a major omission in the Future Framework. This should be fundamental to the Future Framework. Without these DMAPs there is no pipeline of projects that is required to kick start many of the other key priorities listed (e.g. skills, technology and supply chain development, industrial alignment including infrastructure, port facilities etc.).</p>
1(b).	<p>Has each key priority been adequately described and considered all relevant components?</p> <p>Response: Comments of some of the key priorities are provided below:</p> <ul style="list-style-type: none"> • Environmental concerns – It is vital that DECC defines a coherent spatial strategy and delivery plan for ORE to achieve Ireland’s ambitious deployment targets for 2040 and 2050 in line with the Climate Action Plan whilst affording appropriate protection to environmental assets. This must include transparent and robust processes, criteria and phasing for the preparation of regional DMAPs. • Public and stakeholder consultation - We are concerned that the development of the OREDP II and successor National Spatial Strategy for ORE now appear to have been abandoned and that useful

No.	Question and Response
	<p>progress made in understanding the needs of the ORE sector and addressing key spatial planning issues throughout the development processes may now be lost.</p> <ul style="list-style-type: none"> Cost competitiveness – In order to ensure cost competitiveness, it is important that the subsidy auction to replace ORESS is done as close to FID as possible. ORESS 2.1 should be the exception and not the rule. In terms of export, it should be noted that if we focus solely on exporting offshore wind by interconnection, then Ireland's competition becomes our wind versus the likes of French nuclear, for example. For Ireland, as a net exporter, we need our marginal price to be cheaper than the marginal price in France, the UK, Spain, Portugal, Germany, Belgium and the Netherlands. Therefore, prior to exporting our power, we should be looking to maximise the use of that power domestically through creating value products and services using our wind. Delivery of targets – The Future Framework acknowledges that delivery will be impacted most significantly in the planning and development stage of ORE development (including spatial mapping) therefore a strong emphasis will therefore be placed on streamlining government procedures while signposting relevant timelines to ensure advanced investment opportunities. This appears to be lacking in terms of the Future Framework and its lack of roadmap for DMAPs and commitment to getting DMAPs completed by 2025. Action 13 states <i>"Align resourcing needs across Government Departments and agencies to ensure all Government bodies in relevant marine and ORE disciplines are properly resourced to discharge the expanded responsibilities as set out under the FF"</i>. This relates to Table 2 - Summary table of the plan-led process components during the ORE development stage. This shows DMAPs as the 1st development stage. Action 13 needs to be more specific in terms of resources and a dedicated team within DECC that will deliver DMAPs for the rest of the coast by the end of 2025. Availability of relevant data – A plan to do biological and metocean surveys is mentioned but it is not clear if these surveys will define DMAPs or if DECC will follow the current process where DMAP is desktop based and then data is provided on only designated auction site. Whilst we welcome the Irish Government's strategy to widen data procurement and commission their own surveys in support of offshore development, it is not clear where the planned programme of environmental and metocean surveys fit into the Future Framework. <p>It is important that the right data sets are obtained at the right time in development. Given the time frames required for data collection (e.g. Digital Aerial Surveys) and the large areas involved, it is assumed that these data may be used by the State in support of decisions pertaining to planning consent. This needs to be clarified. DECCs data collection strategy needs to be co-designed and transparent. Unnecessary data collection should not become a distraction in the DMAP process causing further delays and thus losing the pipeline, supply chain and investor confidence.</p>
1(c).	How best should the 2GW of non-grid limited offshore wind capacity be procured?
	<p>Response:</p> <p>Between 2023 and 2030, Action 4 of the National Hydrogen Strategy aims to develop commercial business models to facilitate the scale-up and advancement of renewable hydrogen. This initiative specifically targets leveraging surplus renewable grid electricity before 2030 and initiating the utilization of 2GW of offshore wind energy by 2030. Hydrogen production technology is advancing rapidly, while the technology for converting hydrogen into its derivatives like ammonia, methanol, and eSAF (electrofuels) has reached a more mature stage.</p>

No.	Question and Response
	<p>The Future Framework seems to add confusion in relation to how the 2GW of non-grid limited capacity will be procured with the introduction of interconnector-hybrid projects or non-grid limited projects. This is unhelpful in an already challenging hydrogen industry. Hydrogen developers require a commitment in the Future Framework that this 2GW will be earmarked for hydrogen production to kickstart our Power-to-X economy. We ask DECC not only to commit on this 2GW but also to publish a roadmap as to future non-grid actions dedicated to Power-to -X production.</p> <p>To sum up, the introduction of language within the Future Framework, suggesting that the 2GW capacity aims to address challenges related to grid limitations through interconnector-hybrid projects or non-grid limited projects, is generating uncertainty regarding the procurement and intended use for this 2GW of non-grid limited capacity. This uncertainty exacerbates the challenges already faced by the hydrogen industry and implies a lack of ambition by Government to be early movers in the production of hydrogen derived fuels. Hydrogen developers urgently need a clear commitment within the Future Framework that this 2GW will be designated for hydrogen production, and production of hydrogen derived fuels thereby catalysing the development of our Power-to-X economy. We respectively request the commitment to this 2GW allocation but also the publication of a roadmap outlining future non-grid actions specifically dedicated to Power-to-X production. Establishing a hydrogen economy in Ireland holds significantly greater long-term economic potential for the Irish economy compared to exporting via interconnection.</p>
1(d).	<p>What are your views on the design parameters for the successor scheme to ORESS, what else should/should not be considered?</p>
	<p>Response:</p> <p>Under the current approach for Phase 2 projects, holding the ORESS auction at a very early stage in the project lifecycle means that developers will be building cost models to predict the supply chain needed for a Final Investment Decision to be taken at least 5-6 years in advance. Given that typically supply chain only enter into formal engagement with developers after planning consent has been granted to ensure their order book is secured and following other successful international models a more appropriate pathway would be to ensure that MAC and development permission are in advance of ORESS (or route to market in non-ORESS schemes), as follows:</p> <div data-bbox="370 1360 1252 1461">  <pre> graph LR A[DMAP] --> B[MAC] B --> C[Development Permission] C --> D[Route to market] </pre> </div> <p>This would reduce deployment risks, with capacity procurement or route to market confirmation (i.e. an auction) instead occurring as close as possible to financial close, rather than many years earlier before planning consent is even secured or any contracts are placed. This means that the successor to ORESS should be decoupled from earlier allocation of seabed exclusivity (i.e. through a competitive MAC process) and should only take place after planning consent and grid capacity is secured. In addition, we recommend introducing non-price criteria that will reward sustainability, innovation and support for local supply chain within this new mechanism. We believe it will be important for projects to demonstrate the value add to Irish society, via supporting local supply chain or enhancing biodiversity.</p>

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	<p>Whatever the successor scheme to ORESS is, it should be part of the Future Framework i.e. how do DECC plan to do this in the future? Currently, we do not know what the ORESS successor looks like, if there will be a competitive MACs and what that would look like. The Future Framework should be providing clarity on all of this and giving certainty to the ORE industry.</p>
1(e).	<p>What frameworks and/or supports are required for alternate routes to market such as CPPAs, Power-to-X projects, interconnector-hybrid projects and export projects?</p>
	<p>Response:</p> <p>We believe that future auctions for projects competing for non-grid limited capacity will require a route to market, a private wire to an Energy Parks (hydrogen/e-fuels production) or other large energy users. As part of this process, projects should demonstrate a credible route to market and have agreements in place with Energy Park operators. The electricity produced from the offshore wind farm is unlikely to be subsidised directly; instead, the hydrogen/e-fuels are likely to be subsidised through a set ‘floor price’ from the European Hydrogen Bank, or similar. This is how the European Union is expected to incentivize European production of hydrogen/e-fuels, to reduce reliance on energy imports and ensure European production of e-fuels will be competitive within Europe. Hydrogen/e-fuel producers will agree long-term PPAs with offshore wind farms at prices that will ensure both projects can be bankable. Securing a partnership and provisional offtake agreement with a viable Energy Park project is crucial to success in a lease auction. A close and transparent partnership with an Energy Park throughout the stages of the offshore wind project development will ensure the project reaches final investment decision and commercial operation date in a timely manner.</p>
1(f).	<p>What additional capacities and responsibilities should be held by industry in the context of the plan-led approach?</p>
	<ul style="list-style-type: none"> • A partnership approach with industry to deliver this framework is essential. The current process of designing policy in isolation and then seeking feedback is suboptimal. In the last two years, two key pieces of policy (Phase 2 and OREDP II) have been stymied by this approach. It is ineffective and inefficient. A new model must be considered. • To maintain effective competition, allow for attrition and secure value for money in a successor to the ORESS support scheme it will be vital to establish and then maintain a strong pipeline of viable development opportunities. This should be done by designating the full extent of the DMAP suitable for ORE in Ireland waters no later than 2025. We would therefore urge DECC to accelerate the development of the planned DMAP roadmap (Action 5) and ensure this provides an effective opportunity to comment on detailed methodologies and criteria through which DMAPs will be established on a consistent basis, rather than only identifying when individual regional DMAPs may be prepared. Further to this, the Government is proposing that it identifies sub-areas within DMAPs for future offshore wind deployment increasing the period required to identify DMAPs. This appears to be beyond the mandate of the government regarding designating DMAPs under the MAP Act. Once a DMAP has been adopted by the Government and environmentally assessed, it should be the responsibility of the industry, who are experts in their field, to identify the most suitable sub areas/sites for offshore wind farms. This promotes the development of offshore wind farms in the most suited areas, at lowest cost and increases the chances of such wind farms progressing through to operational stage. This allows for development via the plan-led regime in the most efficient manner. Under the MAP Act, Chapter 3, Section 21, there is no reference to the competent authority being required to identify sub areas within a DMAP.

No.	Question and Response
	<ul style="list-style-type: none"> It is stated in the Future Framework that “from 2030 onwards, all ORE development in Ireland will be led by the State including....planning permission”. We do not believe it is appropriate for the Government to take on the role of identifying, designing and consenting of projects, as this would appear to go beyond the mandate of the Government as set out under the MAP Act. As per workstream 4 of the economic analysis which accompanies the Future Framework, it is stated that the main disadvantages to this would be: <ul style="list-style-type: none"> The State takes on greater risk in the project development process. There is greater risk that misalignment between state and industry can lead to negative outcomes. The increased responsibilities of the State in a plan-led model are associated with increased resourcing needs and administrative costs. If resourcing is not sufficient, State agencies can become the bottleneck, slowing deployment and impacting investor confidence. Developers may see the market as less attractive as a lack of control over project locations making it harder to develop a continuous pipeline. This would have detrimental effect on a burgeoning supply chain in Ireland. <p>The analysis goes on to examine the advantages and disadvantages of pursuing two different models of a plan-led regime – a hybrid model, and a fully integrated model. It is found that the extension of the State’s responsibility to full project design, permitting and delivery of array cables is likely to yield little value. It is more likely to lead to inefficiencies in design and delivery, and make Ireland a less attractive market for investment due to the additional project risk and complexities it introduces. As demonstrated through the examination of best practice in international markets carried out within the analysis, it is better to leave detailed wind farm design and array cables to industry. This is what industry is comfortable with and experienced in delivering.</p>
1(g).	<p>How can Government facilitate a more comprehensive and streamlined engagement process with developers to ensure national ORE targets are delivered?</p> <p>Response: We need a partnership approach with Government and industry to deliver the Future Framework like in other jurisdictions (e.g. Scotland). The current process of designing policy in isolation and then seeking feedback is suboptimal. A new model must be considered where government and industry work in tandem to deliver the ambition for 2040.</p>
2(a).	<p>What grid infrastructure should be of particular focus in facilitating the build-out of capacity to support ORE generation targets?</p> <p>Response: In order to know where grid infrastructure should be focused and for EirGrid to plan/deliver for 2030s we need to know where projects will be located. We need DMAPs completed in 2025, so EirGrid can plan/deliver for 2030s.</p> <p>Future strategies such as the Offshore Transmission System Strategy and EirGrid’s TES will be key to interacting on and informing this. We recommend that DECC consider the principles of the plan-led regime to ensure that the pathways, interdependencies, and requirements for them are understood and clearly outlined.</p>
2(b).	<p>In relation to National Security/Department of Defence interaction with ORE development, are there any issues you would like to highlight?</p>

No.	Question and Response
	<p>Response:</p> <p>The lack of a security framework for ORE is a concern and it positive that this has been raised. The Department of Defence should change from observer status to full membership of the Offshore Wind Delivery Taskforce and lead a workstream on security which involves industry. The priority should be open a dialogue on what the security issues might be, how they might be addressed and by which institutions.</p>
4(a).	<p>What structures, measures, and interventions can the State and State agencies implement to assist in the development of a long-term, sustainable skills and workforce pipeline? Provide any recommendations on what the State can do to promote careers in ORE across a range of educational backgrounds and movement from other relevant sectors.</p>
	<p>Response:</p> <p>Clear and concise timelines to kick start FLOW. Like other developers, we geared up and encouraged people back to Ireland to bring their experience from other jurisdiction/offshore industries. However, with the government U-turn on Phase 2 policy and sudden switch to the plan led approach sooner than anticipated we have had to reduce our team sizes, which resulted in many staff again leaving Ireland. The worry is they will not be available when we need to gear up again. By providing timelines for DMAPs and MACs, you will create a sustainable pipeline of projects, which will allow investment and development of a long-term, sustainable skills and workforce. We will not have this until we have DMAPs for the coast of Ireland. A stop start approach to planning does not work for the development of a long-term, sustainable skills and workforce pipeline nor for investment in the industry.</p>
4(b).	<p>Are you aware of initiatives in other jurisdictions or at a European level that would be relevant to Ireland's ambition of building a sustainable skills and workforce pipeline for offshore wind?</p>
	<p>Response:</p> <p>In January 2023 the Portuguese government announced five areas off the Atlantic coast where wind farms could potentially be built. With these projects, Portugal is targeting 10GW FLOW of installed capacity and a total investment of €30-40 billion by 2030. Portugal's first auction of licenses to build offshore wind farms, set to be launched this year - Portugal kicked off the preparatory process in November for the auction by inviting companies to present non-binding declarations of interest. This ambition and pace has resulted in a clear signal to the market and helping build a sustainable skills and workforce pipeline for offshore wind in Portugal.</p> <p>Ireland's stated ambition on FLOW needs to be matched by conviction and tangible actions, similar to Portugal.</p>
4(c).	<p>To what extent should an emphasis be placed on multipurpose sites for ORE delivery, including the colocation of devices? What Government structures should be developed to encourage and facilitate progress in this aspect?</p>
	<p>Response:</p> <p>As other developers we would be open to multiuse sites e.g., for other ORE such as solar, wave, Marine Protected Areas, seaweed production etc. Consideration should also be given to nature enhancement within ORE sites. ORESS or MAC non-price criteria could be used to facilitate progress in this aspect, as we believe it will be important for projects to demonstrate the value add to Irish society, via supporting local supply chain or enhancing biodiversity.</p>
4(d).	<p>How can Government ensure policy is kept in line with evolving technological innovation and developments in ORE devices? What structures and government procedures should</p>

No.	Question and Response
	be implemented to future-proof the ORE planning process and account for technological shifts?
Response: <ul style="list-style-type: none"> • To the extent possible, make policy ORE technology agnostic as it will not keep pace and could limit innovation or result in constant changes in ORE planning. • Encouraging design flexibility within the planning system, as this will encourage the use of evolving technologies and accordingly provide the Irish customer with the best price. 	