

## Green Rebel's response to public consultation on Future Framework

26<sup>th</sup> February 2024

### Green Rebel Response Approach

Broadly speaking, Green Rebel is well aligned with the consultation responses of WEI and MRIA. Given our perspective as the provider of survey and data services, we have further elaborated on question 1(f) and 1(g) with particular focus on how they relate to section 1.3.1 (Marine Data). We would welcome the chance to further discuss at an appropriate juncture.

### Response to Question 1(f): What additional capacities and responsibilities should be held by industry in the context of the plan-led approach?

Green Rebel strongly believes that there is a key role to be played by private industry in supporting the State-led site investigations undertaken as part of the Future Framework. It is noted that section 1.3.1 states that *"DECC will work with Geological Survey Ireland and the Marine Institute to conduct surveys in areas where data is either unavailable or not Forthcoming"*.

We do not believe this is the optimal approach to data acquisition as it perceivably sets the State's assets and private sector in direct competition, when collaboration between state and industry will certainly yield better outcomes. This is already evidence with the recently established Expert Advisory Group on Data which is acknowledgement by DECC that collaboration between Industry, NGO's, Developers and Government will be key to the optimal gathering, analysis and application of data for successful ORE development.

Additionally, given the scale of Ireland's ambition for ORE development to 2050, a multi-agency approach will be required. The Geological Survey Ireland and the Marine Institute will unlikely have enough personnel or assets to service this ambition and will certainly require industry support.

We believe the following should be considered:

*"DECC will work with Geological Survey Ireland, the Marine Institute **and Industry** to advise on and conduct surveys in areas where data is either unavailable or not forthcoming."*

Omitting, from the future framework policy, the role of industry for the gathering, analysis and application of data for successful ORE development will;

1. Impact on Infomar and the scientific research community
  - a. The State has invested in state-of-the-art assets (such as the MV Tom Crean) because of the role that scientific research plays in upskilling Ireland's innovators and researchers and to achieve its Infomar objectives, not to act as a substitute for private sector survey companies on large scale development projects. Any significant allocation of vessel days does not serve to achieve this purpose
2. Impact on ORE industry
  - a. Producing ORE grade data is an exhaustive process that requires specialist skills and resources. By asking the MI and GSI to produce this data is not an optimal approach when this is not what those organisations have been structured to achieve. There is inherent risk (both in respect of quality and timelines) adopted if the decision is taken to preclude industry from participating.

3. Impact for taxpayer
  - a. Private sector companies will be able to deliver survey services more economically given the prior investment and workflows that have already been established
4. Consistency with DETE's Industrialisation Strategy and EI's mandate to support
  - a. DETE / EI have repeatedly spoken about the pockets of capability / capacity that exists in the Irish supply chain with early-stage survey work being the highlight. It does not appear to make sense that Ireland Inc would not lean into this to support its indigenous supply chain and maximise the economic opportunity that ORE presents for Irish companies.
5. International precedent
  - a. While there is an extensive precedent for State-led site investigations, this is always managed by the private sector (e.g., RVO in the Netherlands; Crown Estate in the Celtic Sea, etc). There is no precedent for State agencies managing offshore survey works to accelerate ORE development.

**Response to Question 1(g): How can Government facilitate a more comprehensive and streamlined engagement process with developers to ensure national ORE targets are delivered?**

*Section Reference: Action Item 14: "Procure, consolidate and publish all relevant data to support the open sourcing of ocean data available for the protection of the marine environment and biodiversity during development of ORE"*

We welcome the inclusion of this action item and believe the State is the appropriate owner of relevant data. However, this intention has not been reflected in phase one of the recent south coast tender, as only one data set was selected for purchase, and we would encourage this decision to be revisited.

When question 1(g) is considered, together with the recent ask from DECC as to how 2030 delivery can be accelerated, the response always converges on data. Data is the key to accelerating timelines and ensure the delivery of targets.

Green Rebel possesses a data set of over 500km<sup>2</sup> of ORE-grade geophysical data on the south coast that has not been selected and may be sold to a private developer which we believe is contrary to the intentions in this policy document. The State should possess this data and make it available to potential bidders in ORESS2.1 and any other offshore auctions on the south coast to ensure that the Irish electricity consumer gets maximum value.

Given the absence of data on the south coast, and to ensure that ORESS2.1 provides sufficient signals to international investors that set the Future Framework up for success, we believe that the State should procure any data that meets the required quality threshold. We would welcome any opportunity to discuss this further to overcome any challenges (e.g. budgetary, timelines) that may be faced.

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