

Department of Environment, Climate and Communications  
Dublin.



In Deep Business Growth Ltd.

Coilleach, Spiddal,

**Re: Comments on Draft Offshore Renewable Energy Future Framework**

**Policy Statement**

Ireland

09/02/24

To whom it concerns,

I wish to offer the following input to the Draft Policy:

**Environmental Priorities:**

At a policy level, there should be clarity of leadership from Government on Environmental concerns. The combination of the Energy Crisis, and the need for Ireland to develop more strategic control of our energy supplies, combined with the huge environmental concerns arising from Global warming and climate change mean that considerations in favour of ORE development, reducing GHG emissions to reduce Global Warming should trump minor local environmental issues. This must be clearly set out with care and consideration for negative impacts but **clear priorities** should be set in this regard.

The positive environmental impacts from ORE should be catalogued from the published literature and the message about the benefits should be strongly communicated to counter the frivolous, and often inaccurate sensationalism so evident in this area.

**Rural and National Economy**

From an Economic perspective the policy should focus more on the developmental opportunities around the coast, supporting jobs for rural communities where the energy is. Centralising activity into few areas reduces the positive impact to locals effected by the siting of ORE farms and

underplays the importance of the ports around the coast including the existing Fishery Harbour Centres.

The phasing of the approach to ORE is lacking in ambition and in future planning. Much more emphasis needs to be placed on getting Ireland and its coastal facilities prepared so that the much needed expansion of ORE can happen from Irish ports and with Irish skilled workers, thus allowing benefit to be spread around the coast and maximising the economic opportunities to the communities in whose regions ORE developments are built.

### **Ports**

The notion that “a minimum of 4 ports” dedicated to ORE would suffice in Ireland is non-sensical. The development of ORE along the East Coast will require a minimum of 2 Ports to cover the Geographical spread of Activities in the Irish Sea and to cope with the acknowledged “closeness to site” requirements give the relatively “wild” Irish climate,

A minimum of two ports will be required on the South Coast where the Metocean ( Meteorological and Oceanographic) conditions are much more difficult (than the Irish sea) and the ORE potential larger. Cork, while ready to support significant activity will not be able to support the level of activity foreseeable and a second significant port will be required along with support ports for O&M.

The West coast will require at least 3 if not 4 ports as metocean/weather considerations here are extreme and space and weather windows will require spreading the load, **and ensuring the minimum distance possible between the site and the port.**

In the Irish context, the lack of ready facilities, of Ports and even potential Ports with deepwater accessibility is very limited. Add to that the extreme difficulty of securing planning permission for significant Infrastructure in Ireland combined with the potential conflict with SAC's (The Shannon Estuary being a significant case in point) means that securing ports with the space, capacity and geographical advantages sought after by the ORE Industry will be virtually impossible in Ireland.

The Policy should therefore specifically include the Fishery Harbours around the coast owned and operated by DAFM – and consideration should be given to Legislative changes to allow Fishery Harbours to become part of the ORE support infrastructure in tandem with their fisheries activities. The harbours in question are in very important strategic locations and include the major fishery harbours: Killybegs, Ros a Mhíl, An Daingean, CastletownBere, Dunmore East, and Howth, at least.

### **Government Organisation and Management**

Lastly, the ORE Future Framework Policy should not rely on Inter Departmental Task Forces or Working Groups to deliver on this most strategic of projects for Ireland. There is a clear requirement for there to be an Executive Management Role by a senior civil servant in Central Government (probably in Roinn an Taoisigh) to have the responsibility and authority to ensure the delivery of the ORE Policy by each of the many Departments involved in Permitting, Funding, supporting and delivery Renewable Energy.

This appointment should be a policy requirement.

Le gach deá ghuí,

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