

23rd February 2024

Future Framework Consultation
Offshore Environment and Future Development
Department of the Environment, Climate and Communications,
29-31 Adelaide Road,
Dublin 2, D02 X285

By email: FutureFrameworkpublicconsultation@decc.gov.ie

Dear Sir/Madam,

Future Framework consultation– Commercial in Confidence

Shannon Foynes Port Company (SFPC) is situated on the deepest watercourse in Ireland, the Shannon Estuary, which is one of the deepest estuaries in the world. It extends to over 500km² and has channel depths of up to 32m facilitating trade of over €8bn pa. SFPC is the largest bulk port company in Ireland and has statutory maritime jurisdiction over the entire Shannon Estuary, SFPC is a Tier 1 designated port of national strategic importance and a designated core corridor port on the EU TEN-T network.

Our vision outlined in the SFPC Vision 2041 Masterplan, is to position the Port as a key economic driver by enhancing and leveraging its asset base to accommodate offshore and onshore investment within and adjacent to its harbour. In 2022, the Minister for Transport, Eamon Ryan launched the SFPC updated Masterplan, the Vision 2041 Strategic Review. Its core objectives include;

- Deployment of Floating Offshore Wind (FLOW) at scale
- Green Industrial Development and Transition facilitating alternative fuels production
- Required port expansion to meet expanded, diversified and more sustainable logistics services

Please find enclosed our response to the Future Framework Policy consultation which has been provided with the view to support the department with constructive feedback to support a successful delivery of an Irish Offshore Wind Industry together with its associated supply chain.

We welcome the confirmation for the development of the Future Framework Policy for Offshore Renewable Energy (ORE) for which we view as a pivotal phase in unlocking positive local economic, social and environmental benefits beyond Phase 1 projects and ORESS 2.1. The level of positive benefits and market share that Ireland will be able to secure will be dependent on how much ORE is developed. In this regard, Government's steadfast commitment to building a robust pipeline of projects with visibility on development timelines and the consenting process is critically important to enable the development of a sustainable and vibrant sector. We welcome the draft issue of the Future Framework and respectfully suggest that the policy could outline firm commitments to guide and instil confidence in the market particularly with regard to the timeline for establishing a west coast DMAP.

This submission has been prepared in conjunction with Innovative Climate Solutions Limited. Should you have any queries about the submission, please do not hesitate to contact the undersigned or [REDACTED] at [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

Encls.

APPENDIX A

1 National ORE targets up to 2050.

We welcome the government's re-confirmation of commitments of 20GW by 2040 and at least 37GW by 2050 however we are disappointed with the draft policy's commitments proposed. The actions outlined are high level and do not go far enough to give commitments to industry on how and when the industry will have coherent action to progress. Without visibility to some firm actions and a pathway to developing a pipeline of projects, industry and accordingly the national ORE targets are very unlikely to be attained. We would like to reiterate the urgency on the following areas if Ireland is to capture economic value and step into an opportunity to build an Irish Offshore Wind Industry and enable a successful pathway to realising Irish Offshore Wind targets:

- Resourcing of government departments to support DMAP rollout at pace for all coasts by utilising wider resourcing by embracing experience at local authority level coupled with unconflicted external contractors. To date, the growth and reinforcement of DECC teams to support offshore wind development activities has been slow and limited in specialist technical and commercial expertise in a number of areas, which have left industry stakeholders frustrated and financiers and investors with reduced confidence in the market. This has been reflected in a number of key players stepping back from the Irish Market. It is imperative that we unlock all avenues to building resources within the DECC team.
- Urgency in developing a pipeline of projects to support investor confidence and enable supply chain and key enabling infrastructure (i.e. Ports) to make key investment decisions and commence upgrade works. If there isn't visibility of a pipeline or confidence that DMAPS and Projects cannot be deployed with reasonable confidence in timelines and urgency, industry will struggle to have investment confidence in the Irish market. This now has become particularly key in 2024 market environment where developers are narrowing their focus for investments to markets with clearly defined routes to market, have strong government commitment and they have sight to a robust economic return.
- Per its Masterplan, the Vision 2041 Strategic Review, Shannon Foynes Port Company demonstrates that the Shannon Estuary can provide the necessary port infrastructure for a marshalling port to enable Ireland vast ORE resources. Its Masterplan identified four key enablers to develop an ORE delivery chain of scale. These include 1) an integration port facility, 2) a substructure manufacturing facility, 3) sufficiently sheltered deepwater wet storage and 4) operations and maintenance port facilities. The Masterplan demonstrates that Foynes Island can facilitate the integration facility and ESB's Green Atlantic at Moneypoint will accommodate the sub structure facility.

Regarding the Masterplan's demand analysis, and under Phase 1, the Shannon Estuary could facilitate a cumulative of 10 GW of offshore windfarms by 2050 assuming the aforementioned facilities were available by 2028. As we know, the west coast DMAP will act as a trigger for a) this infrastructure to commence through the planning system and b) will assist in devising a viable funding model.

The table below outlines a typical project timeline for the port infrastructure required by offshore wind developers. Assuming a DMAP is published in 2024, this means that due to established lead times, the necessary port infrastructure will not be commissioned until 2034.

2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Pre-planning				Planning		Detailed Design & Main Contractor Procurement		Construction		
<ul style="list-style-type: none"> • Procurement • Site assessments • S.I • MAC application 				<ul style="list-style-type: none"> • ABP • JR 						

The draft Future Framework commits to publication of a DMAP schedule this year, however, the time required to approve a DMAP is circa two years, this implies a west coast DMAP will not be available until 2026. Consequently, and due to typical lead time outlined in the above table, the necessary port infrastructure will not be commissioned until 2036. In that scenario and under Phase 1 of our Masterplan's demand analysis, a cumulative of circa 5GW would be supported by 2050 and circa 1GW by 2040. These outputs represent just 13.5% of Ireland's 2050 37GW target and 5% of the 2040 target. Accordingly, for the Shannon Estuary to assist in meeting Ireland's ORE targets, a west coast DMAP should be completed without delay and as expeditiously as possible.

- Urgent roll out of technology agnostic DMAP's which not only include fixed and floating offshore wind solutions but also include enabling infrastructure such as ports, cable, offshore substations and wet storage.

Industry acknowledges that fixed bottom wind is more mature and brings early advantages for Ireland. However suitable waters for fixed offshore are limited (economic analyst support for Future framework Policy advised they based analysis on Cap of 10GW) and challenging due to ground and metocean conditions and could be challenged with respect to cumulative effect and visual impact.

For Ireland to meet its above-mentioned targets it will need to embrace and diversify with floating technology and rapidly unlock development and construction of enabling infrastructure and a supply chain. It is imperative that we plan for this now to unlock the economic benefits outlined in the supporting economic analysis provided with the Draft Future Framework Policy. Work commenced last year with early development activities for the construction of enabling port infrastructure at Shannon Foynes, however with further delays and undefined timelines in place for a West Coast DMAP (Which will be required to support a planning application for the Port upgrades), there is a risk that with further delays the EIA work to date (I.e. relevant survey) will have exceeded their lifespan to be included in a planning application and will be required to be redone which not only will incur a future cost but also place yet another investment opportunity for growth at risk.

- Building Confidence in Floating Technology as viability technology is key in Ireland. To date, confidence has wavered and investor patience exhausted manifesting in some notable names exiting the Irish market. Globally Floating is being recognised as a strong technology for offshore wind with over 15MW allocated in Scotwind, approx. 4GW of floating in California, a strong pipeline in South Korea and upcoming floating auctions in the UK's Celtic Sea, Norway, Portugal and France.
- Enabling Grid reinforcement and expansion of on/onshore grid infrastructure. A delay in the roll out of DMAPS will have a significant impact on the development of grid and export infrastructure planning. Policy should identify where demand and production requirements will sit nationally. To do this at pace, and in an optimised manner, DMAP locations and most importantly their timelines, should be committed to immediately and rolled out concurrently without delay. Due to the vast Atlantic resource and its proximity to the Shannon Estuary, a West coast DMAP should be prioritised. The Shannon Estuary particularly with the decommissioning of existing power generation in the coming years and coupled with current availability, offer significant opportunity for ORE supply chain deliverables and route to market as well as enabling diversification of the Irish Offshore Wind portfolio. The Shannon Foynes Port Masterplan, the Shannon Estuary Economic Taskforce Report and the Green Atlantic Moneypoint all demonstrate that the Shannon Estuary is best suited to accommodate a marshaling port for fixed and floating wind as well as locating the infrastructure to produce hydrogen, ammonia and Sustainable Aviation Fuel (SAF).
- One key point outlined in the Afry economic analysis supports urgency to enable early movement on market to support securing early contracts in the case of export of Hydrogen / Ammonia into Europe. If Ireland waits too long, we will simply miss the economic opportunities. To date we have already seen advancement of future opportunities though the recent announcement of an MOU between Shannon Foynes and Rotterdam in respect to European green fuels ¹ if this is to be realised we need urgency in taking step to giving confidence to industry

¹ [Port of Rotterdam and Shannon Foynes to explore development of European green fuels supply chain corridor \(portnews.ru\)](https://portnews.ru)

that we can build robust timelines to development and building a robust supply chain and skillset to support the industries.

2 Project development procedures

We welcome the plan led approach and the use of DMAP to map out Irelands Offshore Renewables opportunities however the mechanism to support the allocation of seabed areas at present (i.e. via ORESS 2.1) is sub optimal and high risk and will ultimately add cost to Irish customers. We strongly advocate for a competitive MAC (i.e. seabed leasing process) to be adopted for project allocation beyond ORESS 2.1:

- The South Coast DMAP is to be allocated via ORESS auction process (i.e. no MAC allocated in advance of auction). The adoption of an ORESS approach is arguably viable and used in a number of European countries, however its proposed adoption in Ireland differs from other jurisdictions whereby significant development effort and derisking activities have been carried out for a number of years in advance of an auction. In essence, the governments in these jurisdictions (including Irish Government) are developers for the early-stage development and derisking of these prospective sites. It is imperative that the regulatory framework in Ireland is consistent with international best practice to support investment and value for the Irish Customer.
- It has been suggested that there is a deficit of resources to manage the process for supporting DMAP definition with the view to going straight to ORESS. Due to the lack of robust data (i.e. geotechnical) and wider development activities to support project derisking planning and consent, developers are presented in the case of ORESS 2.1 with an auction that is high risk and of questionable viability.
- Lack of commercial terms to protect developers in the event that the grid connection (now being developed by Eirgrid) is not ready at connection date.
- Limited development timeline for developers to a) carry out project de-risking activities and b) lock in supply chain pricing, which ultimately will result in higher premium on prices being required at auction.
- Refinement and site selection within the broader DMAP area: To date (on South Coast DMAP), there is a lack of visibility on the constraints and selection criteria that are being utilized to identify the DMAP boundary or the deselection of the sites themselves. Industry has a wealth of knowledge and experience in these areas, and it would benefit the Irish Offshore Renewable Industry if wider collaboration and transparency was applied to the DMAP process. It is noted that there are external bodies/consultants leading the identification and selection process that are free from conflicts and have the appropriate commercial and technical expertise.

3 Resourcing off the coast of Ireland

Building Capacity at Scale with regional diversity: We would strongly recommend the deployment of DMAP allocation at pace to enable industry to i) pro-actively assess viable opportunities, ii) assess and derisk sites and iii) enable the building and investment in the supply chain to support unlocking Ireland's ORE targets.

- The current approach to DMAP implementation is considered by many to be sub optimal and we understand that there are limitations around resourcing. Resources could be unlocked by empowering local county councils complemented with expert consultants to support the DMAP.
- To date, Irelands Offshore Wind development opportunities lie within Phase 1 and the proposed Southern DMAP. We recognize the progress made to date and note there are many risks threatening the national ORE targets. These risks include attrition on projects, risks due to cumulative effects, complexity due to nomination of special areas of conservation, challenges on seabed colocation to name some. In order to mitigate these risks we strongly encourage a West Coast DMAP to commence by the end of 2024. Due to the lead in time of doing a DMAP (approx. 12-18 months) and the urgency to support infrastructure upgrades (Ports, Grid etc.) which equally will have long lead times due to planning and construction, it is imperative that we consider wider resourcing opportunity so that Ireland will meet its 2040 and 2050 targets and obligations.

4 Future ORE data acquisition strategy

Robust Datasets and Spatial Planning: We like to highlight how critical it is to that the spatial planning exercise to define future DMAP areas is supported by a robust process that is reliant on spatial data collection, which is essential to evidence-based spatial planning.

- For a plan led approach, we stress the importance of collating a robust dataset for the DMAP areas which is critical to support not only DECC's down selection of a site but also to enable developers to de-risk a development and support a robust business case for a bankable bid .
 - Proceeding without a robust process in place runs the risk of increased bid prices at auction (due to higher level of uncertainty and risk) coupled with decreased participation/competition at the auction, which may result in higher auction prices which in turn would impact on end consumers economic benefit and value.
 - We would also like to stress that ongoing data collection has an important role in determining areas for ORE development and underpinning a robust evidence-based process.
- **DMAP data collection and surveys:** Building strong data bases to support and derisk ORE is key to streamlining roll
 - out of auctions and early derisking of projects:
 - We would recommend that benthic and aerial bird and marine mammal surveys are commenced at both the strategic and EIA level (on the refined area/s) to both support a nested survey design for future development and support the ORE development program.
 - We would recommend addressing the key evidence gaps in Ireland to address the NPWS concerns, and one key area is the lack of data on migratory bats. Consideration could be given to the use of MOTUS technology to monitor bats and join existing programs and contact the Strategic Steering Committee leading the British collaboration involving the University of Hull, BTO, and the Bird Observatories Council. Impacts to bats have been identified as an issue to be resolved during the EIA process but similar to bird migration, would benefit from a wider monitoring program. Given the seasonal constraints (March – October), and the need for transboundary co-operation with Great Britain to include receivers on the west coast of GB, we would recommend discussions are also held with The Crown Estate, particularly with regard to their data collection program to inform their Celtic Sea (AR5) offshore wind leasing round.
- 5 Opportunity for pre -commercial demonstration area and green industrial
- We welcomed and supported the inclusion of an action to investigate the feasibility of a floating offshore wind demonstrator site. We strongly recommend that a site off the west coast is considered as it not only includes a prime opportunity to test floating technology in prime conditions but would enable an opportunity for a demonstrator facility to be a central point for the establishment of a Green Industrial Hub in the Estuary area. We would welcome an opportunity to present thoughts on this opportunity as part of the proposed feasibility study. We truly believe that this would present a robust mechanism to not only support demonstration and kick start an Irish Floating Industry but enable cross industry collaboration (energy, tech, aviation, storage, skills growth and Innovation) and an opportunity to combine it with commercial scale up of the supply chain in the region.
- 6 Domestic and industrial demands
- Ireland is challenged at present to meet its domestic and industrial demand. We believe the underlying demand assumptions for Industrial and Data centre demand and growth should be updated. Consultation with IDA through the Shannon Estuary Economic Taskforce have guided a demand of circa 3-5GW for data centres and other industrial uses. Further to this SEEFT conservatively estimate that there is a 2GW requirement for SAF potential alone within the Shannon Estuary area. The MoU between Shannon Foynes and the Port of Rotterdam identifies the need for significant hydrogen demand next decade requiring at least 6GW of offshore wind by 2040.
- 7 Cross infrastructure & Industry Collaboration
- Government – Industry Collaboration
- We have seen significant change in direction in the last year within the Irish Offshore Wind Market and we would like to reinforce again that it is key that we bring industry and government closer in collaboration if we are to be successful at realising the Irish Offshore Wind Opportunity. At present, we have the Offshore Wind Delivery Taskforce operating between government departments with some industry input via two trade bodies. If we are to accelerate at pace, industry and government need to become intertwined in dealing with

industry challenges. Industry can bring a strong and informed expertise on best practices and by collaboration, support the formulation of policy, robust systems and process to de-risk the Irish Offshore Industry.

There are number examples of strong industry collaboration in the UK one being the FLOW Taskforce which is co-chaired by RUK and DENZ (UK Government). Both Industry and government work collaboratively to derisk developments. Examples of this collaboration includes the procurement of evidence-based studies to support business cases or government understanding of where key interventions are required (Ie policy, funding, cross collaboration etc). This has proved highly successful to date and have been a key body in also inputting into the upcoming UK Industrial Growth Plan which is due for launch in March 2024.

In summary the below is an overview of the key asks to government:

- **Resourcing:** An urgent response to the resource limitations in DECC drawing upon local county council teams where appropriate (as an example Clare County Council have experience in similar assessment and deploying key policy at pace.) A non- conflicted external consultant will also play a key role in supporting key technical and commercial decision making within the department and wider resource pool.
- **DMAP's:** Roll out of multi coast technology agnostic DMAP's at pace to support capacity building of future projects. Ireland West Coast DMAP should be commenced by the end of 2024 to enable unlocking economic opportunities and to support development of enabling port infrastructure on the Shannon Estuary. The establishment of an offshore demonstration hub and onshore green industrial park in the Shannon Estuary region should also be considered.
- **Establishment of an Industry – Government** Working Group/Taskforce -to collectively and progressively bring industry knowledge and experience closer together and assist more directly with government policy and planning. This type of model has worked well under UK models such as Offshore Wind Industry Council (OWIC) and FLOW Taskforce.