Simply Blue
Sustainable Fuels

Offshore Renewable Energy Future Framework

ORE Future Framework Consultation Response

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Executive Summary

In response to the Draft ORE Future Framework Policy Statement Consultation, Simply Blue Group's Sustainable Fuels division (SBSF) presents an assessment and recommendations for Ireland's offshore renewable energy (ORE) sector and its transition to sustainable fuel production. With a focus on green hydrogen and its derivatives, SBSF underscores the critical role of offshore wind in facilitating large-scale sustainable fuel production for hard-to-abate sectors like HGV, aviation, and marine transport, which are essential for achieving climate targets.

SBSF acknowledges Ireland's potential for offshore renewable energy and emphasises the need for ambitious, collaborative efforts to capitalise on this opportunity. The Irish Government's Proposed South Coast Renewable Energy DMAP proposal highlights the extensive area that is technically suitable for fixed offshore wind. With the potential for large-scale GW development in the Irish Celtic Sea, connected to an Energy Park facility in the region, the production of sustainable fuels like Green Ammonia and Sustainable Aviation Fuel will be competitive with European markets. Ensuring that offshore wind (OSW) developers have a credible route to market is prioritised in the qualification criteria for the seabed auctions in 2025 for non-grid connected capacity is essential.

SBSF has advocated for establishing a renewable energy park in Cork Harbour, which boasts many essential characteristics for such a development. The lower harbour area is strategically positioned to accommodate cables from the south coast DMAP zone. Additionally, abundant industrial-zoned land is available to construct a renewable energy park. Moreover, the area benefits from existing oil & gas and power generation industries and public acceptance of such ventures. Furthermore, it has a pre-existing electrical infrastructure and is adjacent to the gas network. These combined features make the infrastructure in this area the most suitable in the country for hosting an Energy Park capable of connecting multi-gigawatts of offshore wind to a sustainable fuels production facility. Moreover, the presence of existing marine and port infrastructure facilitates access to export markets, further enhancing the viability of the proposed renewable energy park.

In addition, there is potential for a hybrid grid connection with two power generators in the vicinity. This setup would allow the Energy Park to adjust its production of sustainable fuels according to grid demands, with the

ability to ramp down production when power demand is high. Large-scale batteries could also contribute to fast-response grid balancing. Furthermore, the industrial-zoned land in the area presents significant opportunities for the establishment of Data Centers, which increasingly require green and reliable power—a need that the Energy Park facility can fulfill.

Moreover, efforts are underway to explore the feasibility of constructing an ammonia-fueled electricity generation plant at Whitegate in Cork. Centrica has entered into a memorandum of understanding with Mitsubishi Power Europe to assess the development, construction, and operation of such a facility.

Additionally, the Energy Park can produce green hydrogen through water electrolysis and separate nitrogen from air, which can then be combined to produce ammonia.

A proposed offshore windfarm should be required to have secured a partnership and provisional offtake agreement with a viable Energy Park to be successful in a lease auction. The offshore windfarm and the Energy Park will have to maintain a transparent and close partnership throughout the project development stages to ensure both projects promptly reach the Final Investment Decision (FID) and Commercial Operations Date (COD) in tandem. Projects of this structured partnership will prevent valuable seabed allocation from being tied up in impractical projects that will not reach FID.

The Future Framework Policy Statement must articulate clear long-term objectives, timelines, and strategies to instil investor confidence and unlock economic benefits. Key priorities include synchronising offshore wind and renewable hydrogen policies, streamlining planning processes, and enhancing clarity on port development and development of Renewable Energy Zones (REZs).

The plan-led approach outlined in the Future Framework Policy presents a pathway to success, but transparency and collaboration with industry are crucial. SBSF urges the Department of Environment, Climate and Communications (DECC) to share detailed information on project auctions and to commit 2GW of offshore wind capacity to hydrogen production. Additionally, ORE developers should be required to demonstrate a viable Route-to-Market pathway, leveraging private wire connections to Energy Parks.

Industry involvement is pivotal in achieving ORE targets, particularly in technical expertise, stakeholder engagement, and project development. However, a deeper level of collaboration between Government and industry is necessary, involving early engagement and integrating industry insights into policy formulation.

Grid infrastructure, port development, and export potential are key considerations. SBSF calls for a comprehensive grid expansion plan, expedited release of the National Ports and other Policies, and exploration of opportunities to attract foreign investment in hydrogen-derived fuels.

The Future Framework Policy Statement must address domestic industry and workforce development, promoting careers in ORE across various educational backgrounds. Initiatives should focus on re-skilling workers to support the industry's growth.

In summary, SBSF advocates for a proactive approach to ORE development, leveraging offshore wind for sustainable fuel production and positioning Ireland as a leader in transitioning to a low-carbon economy. Collaboration, clarity, and long-term strategic planning are essential for success in this dynamic and promising sector.

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1 Introduction

In 2021, Simply Blue Group expanded its portfolio by introducing a new Green Hydrogen and Sustainable Fuels division. These innovative products are derived from renewable electricity sources found globally. These sustainable fuels serve as "drop-in" alternatives for challenging-to-decarbonise sectors such as aviation, marine transport, and chemical production. The production of Green Hydrogen and Sustainable Fuels will be centralised in onshore Renewable Energy Parks, reflecting Simply Blue Group's commitment to large-scale sustainability initiatives. Currently, Simply Blue Group is actively involved in developing a diverse portfolio of Renewable Energy Park projects across multiple countries.

SBG recognises the pivotal role of offshore wind as a catalyst for large-scale sustainable fuel production such as ammonia, methanol and sustainable aviation fuel (SAF). This sustainable energy source offers the potential to power significant sustainable fuel production plants and presents a compelling opportunity to decarbonise the marine and aviation sectors. As governments and industries worldwide accelerate their efforts toward carbon neutrality, the transportation sector, responsible for a substantial portion of greenhouse gas emissions, demands urgent decarbonisation.

Simply Blue Sustainable Fuels (SBSF) appreciates the opportunity the Department of Environment, Climate and Communications (DECC) extended to contribute feedback on the Draft ORE Future Framework Policy Statement Consultation.

2 Consultation Response

2.1 General Comments:

Ireland has significant potential for developing offshore renewable energy, including wind, wave and tidal energy, that can aid in delivering our long-term climate goals. With ambition, focus, and collaboration, Ireland can secure its clean, affordable energy supply while fostering indigenous green growth and capitalising on export markets. Such efforts will align with Europe's aim of achieving climate neutrality by 2050.

Realising Ireland's offshore renewable energy potential and the supplementary hydrogen economy necessitates real ambition and a strategic long-term approach. The ORE Future Framework Policy Statement should set out these elements to outline our long-term ambitions and objectives and provide a clear roadmap with timelines for achieving these goals. SBSF was hopeful that the ORE Future Framework policy would distinctly delineate the policies falling under its purview and articulate the essential steps for success. The lack of synchronised, coherent, and timely development of port, offshore wind and renewable hydrogen plans makes us uneasy. Enhancing clarity regarding Port development, DMAP timelines, private wire clarity, Renewable Energy Zones (REZs), and allocating dedicated renewable energy for hydrogen production would instil confidence among investors and developers. This would unlock economic benefits for Ireland, creating both direct and indirect job opportunities.

We endorse and commend the implementation of the South Coast DMAP and stress the importance of continuous industry consultation on future DMAPs. Streamlining and accelerating the process for other DMAPs will empower developers to secure investment and be early movers in the hydrogen industry. Moreover, we recommend that DECC fosters collaboration with Industry and broadens its DMAP approach to include the identification of Renewable Energy Zones (REZs) to identify potential locations for Hydrogen Valleys and Energy Parks. This expansion would facilitate developers and potential off-takers in expediting Route-to-Market pathways alongside ORE development.

After a DMAP has been endorsed by the Government and subjected to environmental assessment, it should become the Industry's responsibility, given its expertise, to pinpoint the most suitable subareas or sites for

offshore wind farms and renewable Energy Parks. This approach fosters the development of wind farms & Energy Parks in optimal locations, minimising costs and enhancing the likelihood of project advancement to the operational phase. Such an approach facilitates efficient development under the plan-led regime. Notably, under the MAP Act, Chapter 3, Section 21, there is no stipulation mandating the competent authority to identify subareas within a DMAP.

As outlined, the draft Future Framework Policy Statement, a pivotal initiative of the Offshore Wind Delivery Taskforce (OWDT), represents a significant opportunity to chart a clear path for the widespread development of Offshore Renewable Energy (ORE) and hydrogen production. Achieving this requires decisive actions regarding future directions and intergovernmental dependencies, including establishing and initiating a long-term, plan-led approach for Ireland's offshore renewable energy future. It's imperative to clearly define and align these efforts with other policies, such as the SEAI Technology Roadmap, Offshore Transmission Strategy, Private Wire, Hydrogen Strategy, and the future Designated Maritime Area Plan (DMAP) Roadmap. Incorporating clear milestones and robust governance oversight into the broader policy framework is essential for fostering market confidence.

Timely application of EU policy is also vital to provide investors with certainty, thus fostering the growth of Ireland's sustainable offshore renewable energy and hydrogen economy. We believe this policy lacks a clear alignment of key strategies for effectively delivering Offshore Renewable Energy (ORE). Additionally, it falls short in providing the necessary clarity to inspire confidence for investment. Furthermore, it fails to outline how the ORE policy will integrate with all relevant energy system components.

SBSF respectfully suggests that the Government allocate DECC and OWDT the necessary resources they require to accelerate the ORE process and that DECC and OWDT engage with industry and advocacy groups more frequently to gather input for future draft consultations

2.2 Pathway to Success

2.2.1 The Plan Led Process

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?

1(b) Has each key priority been adequately described and considered all relevant components? For each key priority please provide any additional concerns, aspects or commentary for inclusion.

SBSF supports the plan-led approach implemented by the Government, but we urge maximum transparency with Industry and developers. We respectfully request DECC share more detailed information on project auctions like ORESS to include timelines and clarity of non-grid capacity for hydrogen production for 2030/2040/2050, grid connections & proposed landing points to energy clusters, grid build-out and release of Eirgrid's Grid Implementation Plan pre-2025.

SBSF would encourage the OWDT to ensure that the required resources are available to deliver on the action items outlined in the ORE Framework Policy and strategies in development. Enhanced clarity will facilitate informed decision-making and foster confidence in our renewable energy endeavours.

2.2.2 Route to Market

1(c) How best should the 2GW of non-grid limited offshore wind capacity be procured?
1(d) What are your views on the design parameters for the successor scheme to ORESS, what else should/should not be considered?
1(e) What frameworks and/or supports are required for alternate routes to market such asCPPAs, Power-to-X projects, interconnector-hybrid projects and export projects?

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 utilising 2GW offshore wind energy post 2030. Hydrogen production technology is advancing rapidly, while the technology for converting hydrogen into derivatives like ammonia, methanol, and SAF is gaining maturity.

The introduction of language within the ORE 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 the Government to be early movers in producing hydrogen-derived fuels. The AFRY WS3 identified that there is a risk associated with waiting. Hydrogen developers urgently need a clear commitment within the Future Framework that this 2GW will be designated for hydrogen production & production of hydrogen-derived fuels, thereby catalysing the development of our Power-to-X economy. Establishing a hydrogen economy in Ireland holds significantly greater long-term economic potential for the Irish economy compared to exporting via interconnection. SBSF urges DECC to commit to this 2GW allocation and publish a roadmap outlining future non-grid actions specifically dedicated to Power-to-X production.

SBSF advocates that fixed-bottom projects participating in 2025 auctions for non-grid limited capacity should demonstrate a viable Route-to-Market (RtM) through a private wire connection to Energy Parks for power-to-X production. Developers should be required to present a credible RtM and have provisional commercial agreements in place with an offtaker to qualify for the seabed auction application process. While direct subsidies for electricity from offshore wind farms are unlikely, subsidies for power-to-X are anticipated through a predetermined 'floor price' from entities like the European Hydrogen Bank (or future EU entity). This mechanism aims to incentivise European production of hydrogen & sustainable fuels, reducing reliance on energy imports and ensuring regional competitiveness. Power-to-X producers will establish long-term Power Purchase Agreements (PPAs) with offshore wind farms at mutually beneficial prices, ensuring project bankability. A proposed offshore windfarm should be required to have secured a partnership and provisional offtake agreement with a viable Energy Park to be successful in a lease auction. The offshore windfarm and the Energy Park will have to maintain a transparent and close partnership throughout the project development stages to ensure both projects promptly reach the Final Investment Decision (FID) and Commercial Operations Date (COD) in tandem. Projects of this structured partnership will prevent valuable seabed allocation from being tied up in impractical projects that will not reach FID.

SBSF strongly recommends that the Government carefully considers fixed-bottom offshore wind via private wire connections to large-scale energy parks for power-to-X conversion to supply domestic and international markets.

1(f) What additional capacities and responsibilities should be held by Industry in the context of the plan-led approach?
1(g) How can Government facilitate a more comprehensive and streamlined engagement process with developers to ensure national ORE targets are delivered?

In the context of a plan-led approach, industries can significantly contribute to Ireland achieving our national ORE targets in the following areas:

(i) Technical Expertise: Industries possess in-depth technical knowledge to contribute actively to the development and implementation of the plan. These include understanding regulatory framework, environmental considerations, and technological advancements relevant to their sector.

(ii) Data Sharing: Industries will provide accurate and relevant data to inform planning authorities, including sharing information on production capacities, resource availability, and market trends to facilitate informed decision-making.

(iii) Stakeholder Engagement: Industries will actively engage with stakeholders in key strategic locations, including local communities and environmental groups, to ensure transparency and address concerns during development. Clear and definitive policies from the Government will facilitate and enhance our stakeholder engagement efforts.

(iv) Adaptability and Resilience: Industries will be prepared to adapt to changing circumstances and unforeseen challenges in this fast-evolving industry. This includes developing contingency plans and implementing measures to enhance resilience against risks such as supply chain disruptions. Industries would value clear, aligned policies from the Government aimed at minimising unnecessary changes and providing stability to this emerging Industry to the best of their ability.

(v) Project Development: Industries will play a key role in developing offshore renewable energy & Energy Park projects, from site selection and feasibility studies to construction and operation. We encourage Governmental departments to leverage our expertise in project management, engineering, and modelling to ensure successful implementation. After a DMAP has been endorsed by the Government and subjected to environmental assessment, it should become the Industry's responsibility, given its expertise, to pinpoint the most suitable subareas or sites for offshore wind farms and renewable Energy Parks. This approach fosters the development of wind farms & Energy Parks in optimal locations, minimising costs and enhancing the likelihood of project advancement to

the operational phase. Such an approach facilitates efficient development under the plan-led regime. Notably, under the MAP Act, Chapter 3, Section 21, there is no stipulation mandating the competent authority to identify subareas within a DMAP.

(vi) Skills and Training: Industries are committed to cultivating a skilled workforce through tailored training and education programmes designed specifically for the offshore renewable energy sector's needs. This initiative aims to create employment opportunities and ensure that Industry can access the necessary talent to flourish. While this dynamic Industry attracts skilled workers with expertise from diverse sectors such as Energy, Oil & Gas, Maritime, and Science, many professionals are unfortunately leaving due to the Industries' uncertain nature. Industries are eager to actively engage in re-skilling these workers, playing a pivotal role in assisting the Government and Ireland in achieving its national Offshore Renewable Energy targets and contributing to a sustainable energy future.

While Government officials have been open and accommodating to Industry's concerns, it's essential to acknowledge that a deeper level of collaboration is necessary for optimal outcomes. Industry requires a more collaborative partnership with DECC to deliver on the ORE Future Framework and other policies effectively. The current approach of crafting policy in isolation and subsequently soliciting feedback has proven ineffective. SBSF believes the consultation period for the significant ORE Future Framework documents and appendices was inadequately short but was grateful for the one-week extension. Furthermore, there is a significant concern about how consultation responses can be properly considered and integrated before the final release of the Future Framework policy in March.

It's imperative to explore a new model where Government and Industry collaborate closely, operating in tandem to realise the ambitious goals set for 2040. This partnership entails active engagement from the onset of policy formulation, ensuring that industry insights and expertise will be integrated into the drafting process. By fostering this collaborative approach, we can enhance transparency, maximise efficiency, and ensure that policies are aligned with industry needs and capabilities, ultimately driving sustainable growth and innovation in the renewable energy sector.

2.3 Domestic Industry & Infrastructure

2.3.1 Domestic Demand

Policy statements should serve as guidelines that clearly outline specific regulations and directives. They should provide clear direction for industries and developers, enabling them to continue project development while ensuring compliance with legal rules and regulations.

I am eager to ascertain whether the National-Scale Assessment outlined in section 1.3.2 of the Policy Statement, conducted by SEAI, has been published. If this report has not been released, would it not be in the interest of DECC to allow the Industry to challenge and provide feedback on it?

SBSF eagerly anticipates the publication of the National Industry Strategy from the Department of Enterprise, Trade and Employment (DETE). We are eager to see how this document will clearly outline Ireland's strategy to maximise economic benefits and establish a capable and resilient supply chain in line with government targets to deliver 37GW of offshore wind by 2050. We appreciate that the National Industry Strategy will adhere to the timelines set by the OWDT, prioritising the immediate requirements of the industry to deliver offshore wind energy (OWE) projects at scale.

We encourage OWDT to collaboratively develop each aspect of the industry, such as Ports, Grid, DMAPs, RtM, REZs, and Offtaker, in parallel rather than in isolation and provide a clear road map with timelines. Additionally, we welcome the inclusion of an initial Strategic Roadmap, which will guide subsequent strategy development and outline additional measures necessary to foster enterprise opportunities associated with the increased use of offshore wind energy in Ireland and meet export demand for energy derived fuels from OWE.

These initiatives will contribute to the stability of this emerging industry. The ORE Future Framework policy should serve as an overarching statement, with other policy documents acting as its main pillars. Unfortunately, the current policy statement relies on 'significant assumptions' and lacks clarity regarding future policy statements.

2.3.2 Grid Infrastructure

2(a) What grid infrastructure should be of particular focus in facilitating the build-out of capacity to support ORE generation targets?

Section 2.2 of the ORE FutureFramework policy describes the efforts being made and anticipated, yet this policy lacks clear guiding principles regarding ongoing activities, future plans, and timelines for completion. As ports are developed and Designated Maritime Area Plans (DMAPs) are announced, a comprehensive plan for both offshore and onshore grid infrastructure should be considered, with close collaboration and site suitability assessments continuing with EirGrid.

In facilitating the build-out of capacity to support Offshore Renewable Energy (ORE) generation targets, several grid infrastructure components should be of particular focus:

(i) (i) Offshore Grid Connections: Establishing robust offshore grid connections is essential for transmitting electricity efficiently from offshore wind farms to onshore facilities. This involves identifying substation locations, cable routes, and landing points, which should be promptly shared with industry and developers. SBSF eagerly anticipates the publication of the Private Wire Strategy and expects DECC to take an ambitious approach to facilitate Private Wire connections to Energy Parks and other large energy users.

(ii) Onshore Grid Expansion: Upgrading and expanding onshore grid infrastructure in areas adjacent to DMAP and landing points is essential to accommodate the increased electricity transmission from offshore wind farms. Upgrading onshore grid infrastructure to alleviate curtailed and constrained energy from onshore wind sources. This initiative should seek to redistribute this surplus energy to energy parks and other large energy users.

(iii) Grid Balancing and Flexibility: Energy Parks connected via Private Wire to offshore wind farms should also have the option to connect to the grid. This dual connectivity ensures flexibility, allowing Energy Parks to adjust production levels as needed. Additionally, they can serve as a valuable resource for enabling the balancing of the national grid. These parks can play a vital role in implementing advanced grid management technologies like battery energy storage systems and flexible generation sources essential for balancing intermittent renewable energy generation and assisting grid stability.

(iv) Interconnectors: Investing in interconnector projects can enhance energy security, enable cross-border trade of renewable energy, and provide access to larger markets for surplus electricity. However, caution should be exercised to avoid excessive export of renewable energy, prioritising economic growth and attracting new industry to Ireland.

(v) Grid Planning and Coordination: Implementing effective grid planning and coordination mechanisms involving government agencies, grid operators, regulators, developers, and stakeholders are essential to ensure timely and coordinated infrastructure development to support ORE generation targets. This collaboration will enable developers to progress projects, attract foreign investment, and provide Transmission Service Operators (TSOs) with a clear vision of planned private sector projects.

By focusing on these grid infrastructure components, policymakers and stakeholders can effectively facilitate the build-out of capacity to support Offshore Renewable Energy generation targets, create a viable route to market and accelerate the transition to a sustainable energy future.

2.3.3 Ports

SBSF is encouraged to see that the National Ports Policy will play a pivotal role and a key pillar in shaping the Future Framework policy. It is increasingly apparent that the Offshore Wind Delivery Taskforce (OWDT) holds significant responsibility for the effective implementation of future policies, coordinating efforts between the Department of Environment, Climate and Communications (DECC) and the Department of Enterprise, Trade and Employment (DETE). We again emphasise the importance of adequately staffing the OWDT to avoid hindering the progress necessary for this policy's success. Additionally, SBSF calls on the OWDT to prioritise and expedite the release of the National Ports Policy, recognising the crucial role ports will play as key enablers for Offshore Renewable Energy (ORE) initiatives. By ensuring timely and coordinated action, we can effectively leverage port infrastructure to support the growth and development of the offshore renewable energy sector.

2.4 Export Potential

2.4.1 Interconnection

Section 3.1 was disappointing and lacked detail, failing to reference the Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System released in 2021. However, the subsequent information session held on February 13, 2024, and the presentation by Mr. Bernard Nolan was welcomed and highly informative. SBSF requests that the valuable insights from this session, particularly regarding the alignment framework, offshore bidding zones, and indicative timelines, be incorporated into the ORE Future Framework policy.

SBSF draws attention to the Export of Surplus Renewables results in Work Stream 2, highlighting poor economic viability and the challenging project progression environment. We call on DECC to explore options for leveraging the abundant energy resource to attract foreign investors and new industries, particularly in the development of hydrogen derivatives for hard-to-abate sectors and fertiliser production. The growth of these industries and the economic benefits of exports will secure Ireland's future as a key exporter of energy-derived fuels.

2.4.2 Renewable Hydrogen

SBSF acknowledges Action Item 20: Assess renewable hydrogen and renewable hydrogen derivatives transport options, including viability of a hydrogen pipeline by 2040. We urge that this assessment not only evaluates transport options but also considers the economic advantages for the Irish economy, both directly and indirectly, by investing in new industries at scale and utilising hydrogen-derived fuels domestically before exporting hydrogen via pipeline.

The ammonia industry is well-established and has a longstanding presence in various sectors. Primarily used in agriculture as a fertiliser and in industrial processes, ammonia is internationally traded, with a robust supply chain for distribution via pipelines, ships, and tankers. In 2021, Ireland imported $9.25M in ammonia, ranking as the world's 54th largest importer. By producing green ammonia to meet domestic fertiliser needs, Ireland can decarbonise its agricultural sector and potentially become a net exporter, especially considering significant imports by top countries like the USA and Belgium, importing $ 2.47 billion and $ 1.03 billion in 2022. The AFRY WS3 report identified that a key opportunity lies in ammonia/fertilisers production as the most credible long-term option.

Methanol production dates back to the early 20th century, with substantial global capacity and widespread production facilities. It is extensively traded worldwide, with large volumes transported via ships and tankers. Playing a critical role in energy, chemicals, and transportation sectors, the methanol industry is firmly established and contributes significantly to economies.

The Sustainable Aviation Fuel (SAF) market in Europe is experiencing rapid growth, driven by regulatory pressure and increased environmental awareness within the aviation industry. Supported by government incentives, investment in production facilities, and collaborative efforts, the European SAF market holds significant potential to transform the aviation sector and contribute to climate targets by providing a cleaner alternative to conventional jet fuel.

SBSF advocates for bolstering domestic demand and fostering the development of commercially viable industries in ammonia, methanol, and sustainable aviation fuels (SAF). We urge DECC and the OWDT to actively engage with industry stakeholders to assess the feasibility of establishing a renewable energy park by the early 2030s. This proactive approach will drive innovation and investment and accelerate the transition towards a sustainable energy future.

During Information Session 2, participants engaged in valuable discussions. Some key points raised included suggesting that scaling up hydrogen production now would offer advantages over waiting. Additionally, the perceived low risk associated with hydrogen demand and low competition was recognised, attributed to the substantial demand expected from other EU countries.

2.4.3 Export opportunities and implications

Annex 1 and supplementary materials provide an optimistic outlook on the Gross Value Added (GVA) and employment benefits associated with Ireland's Offshore Renewable Energy (ORE) industry. Witnessing the Government's dedication to streamlining the planning process is heartening, and we urge the Government to deliver on this action.

SBSF acknowledges the importance of the risk assessment conducted in WS4. We recognise the necessity for Ireland to diversify risk by exploring various hydrogen-derived products, enabling flexibility to respond to market

demands and the agility to scale up operations to capitalise on global market opportunities. SBSF envisions an Energy Park capable of producing green hydrogen and its derivatives (Methanol, Ammonia, BioSAF, eSAF) to match the needs of both domestic consumption and export markets. SBSF harbours the ambition to take a leading role as an early mover in producing sustainable fuels.

SBSF concurs with several key messages from WS4, particularly regarding the imperative of effectively managing risks to ORE target delivery. This entails aligning efforts with port construction, establishing manufacturing facilities, and securing other essential components and services within the supply chain. Additionally, SBSF advocates for a balanced approach where the Government provides support without overly constraining project design, allowing developers the flexibility to innovate within design parameters.

Moreover, WS4 emphasises the importance of adequately resourcing state bodies and equipping them with the requisite expertise for technical tasks like site surveys, project design, and permitting. This underscores the critical need for government entities to possess the capacity and knowledge to effectively facilitate and regulate the development of offshore renewable energy projects.

2.5 The domestic opportunities and implications of the ORE future

4(a) 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.
4(b) 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?

2.5.1 Jobs and Skills

While this dynamic industry attracts skilled workers with expertise from diverse sectors such as Energy, Oil & Gas, Maritime, and Science, it is disheartening to note that many professionals are departing due to the industry's uncertain nature. However, industries are keen to actively engage in re-skilling these workers, playing a pivotal role in assisting the Government and Ireland in achieving its national Offshore Renewable Energy targets and contributing to a sustainable energy future. This dynamic industry must be provided with certainty and a clear path forward into the future.

Simply Blue Sustainable Fuels would like to express our gratitude to DECC for extending the opportunity to contribute our insights regarding the ORE Future Framework policy consultation. Our team remains available for clarifications or in-depth discussions on the topics. We eagerly anticipate continued engagement and cooperation as we collectively navigate the evolving landscape of energy solutions.

With warm regards,

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Simply Blue Sustainable Fuels (SBSF)