

Department of Environment, Climate and Communications

19 February 2024

Re: Draft Offshore Renewable Energy Future Framework Policy Statement

Dear Sir or Madam,

The Irish Whale and Dolphin Group (IWDG) was established in December 1990 and is an All Ireland group *“dedicated to the conservation and better understanding of cetaceans (whales, dolphins and porpoises) in Irish waters through study, education and interpretation”*.

The IWDG welcomes the opportunity to comment on this Policy Statement. The following comments are offered in the context of the protection and conservation of marine mammals, basking sharks and their habitats during the development of the development of offshore wind in Irish waters into the future. The document *IWDG Policy Document on Offshore Windfarm Development* (2020) states the group’s overall position on ORE; this document is currently under review in light of current developments in legislation, guidance, and technology and an updated one will issue in due course.

The IWDG supports the efforts being made by Government through DECC to decarbonise our energy systems and to reach net zero by or before 2050. The twin crises of climate and biodiversity are existential challenges, and we find ourselves short of options and out of time to solve them: real urgency of action is essential. Nevertheless, the massive engineering projects required on land and sea must not be undertaken without regard for environmental considerations and protections, and the IWDG is encouraged to see that the Department considers them the utmost priority.

The advantages of the plan led approach should be reflected in increased and better directed assessment of the environment and the elimination of unnecessary

geophysical and geotechnical survey effort. Opportunity exists as the DMAPs are rolled out to develop a system of environmental monitoring to correctly map and monitor whales and dolphins, birds, fish, and benthic communities over time. Our understanding of the effects of ORE on our ecosystems should be informed by empirical data from pre construction surveys; close monitoring and management of underwater noise and other potential pollutants during construction; and longitudinal studies to fully comprehend the long term and cumulative effects of the new infrastructure. Our ambitions to build up to 37GW of offshore wind must be matched by an equally ambitious programme to protect the marine environment and to fully understand the effects of the planned development.

Consultation on the South Coast DMAP across sectors and including all stakeholders has been good, and the IWDG supports the Department's aim that comprehensive public participation will remain central throughout the process. Our marine space is of immense social, cultural, economic, and environmental value, and the often conflicting views and concerns of the stakeholders must be incorporated into planning and development now and into the future if we are to achieve our national ambitions to reach net zero.

Yours faithfully

