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

26th February 2024

Response to Consultation on the offshore renewable energy (ORE) Future Framework Policy Statement

By: The Shannon Estuary Economic Taskforce

Dear Sir/Madam,

The Shannon Estuary Economic Taskforce (SEETF) welcomes the publication by DECC of the Future Framework and the retention of the previously published targets of 20GW by 2040 and 37GW by 2050.

The SEETF is an independent taskforce appointed as part of the programme for government by An Taoiseach Leo Varadkar TD (while Minister of Enterprise Trade and Employment). The SEETF was established in April 2022 to make recommendations to government on the economic development potential of the Shannon Estuary region. In July 2023, the SEETF's Final Report¹ was launched at Ardnacrusha by the Taoiseach alongside Minister for Enterprise, Trade and Employment Simon Coveney TD, Minister for Education Norma Foley TD and Minister for the Environment, Climate and Communications Eamonn Ryan TD.

Our consultations² with industry indicate that incremental industrial demand could be of the order of 12-14GW by 2040 and accelerated efforts to lead the way on emerging areas such as Sustainable Aviation Fuel could push industrial demand even higher³. Coupling that with domestic decarbonisation needs, and some export through interconnection, the 20GW target, in our view, is valid. We note that the technology for fixed offshore is very mature. SEAI rates the technology for floating wind (FLOW) at TRL 9 and respected international industry consultants are guiding equivalent energy costs from both technologies by 2035.

Ireland has remarkable assets in the size of our territorial waters and the superior quality of the wind resource in the Atlantic Ocean. These assets are unique in Europe and so we have a significant responsibility to support the overall EU effort on energy decarbonisation and security of supply. The scale necessary to meaningfully support the EU must come primarily from floating technology due to the water depths in the Atlantic.

We strongly support the 37GW by 2050 target and given the enormous opportunity for Ireland to utilise this infinite green power for economic development, we ask that this target is not seen as a limit to our ambitions or potential. Bechtel Inc.⁴ estimate that 70GW of Atlantic wind is currently within reach of the Shannon Estuary Ports, with that number to increase as technology evolves.

However, the fact is that many more countries have access to deep water than shallow, so over the medium to long term the competition for, and potential of, floating wind technology will be far greater

than has been the case for the fixed technology. Minister Coveney has publicly referred to this as an ‘arms race’.

It is the widely held view of both Irish and international developers that Ireland is already at least 5 years behind on progressing floating technology projects and that gap is widening by the day. Having missed out on both onshore and offshore wind technology development of the last 20 years, Ireland also lacks the indigenous industrial supply base and capability of other countries.

SEETF is very worried that failure to deliver these targets could lead to:

- Reduced significance and influence at the EU table for Ireland,
- Significantly enhanced competition for FDI from the UK/Scotland and other EU coastal countries, based on the ambitious scale and pace of deployment of FLOW targets there. Of especial concern is the 16.5GW project proposed by the UK in the Celtic Sea, but also the scale of projects from Norway all the way around to Italy.

So it now becomes a matter of execution of the policy. At time of writing, SEETF believes that there is significant risk of not achieving these necessary 20GW by 2040 & 37GW by 2050 targets without a properly resourced, detailed and credible plan. Such a plan needs to be project managed at a senior level, with sponsorship from government at the highest level.

Ireland urgently needs this managed Plan to attract international technology and capital, on both the supply and demand sides of this important objective. Therefore SEETF strongly believes that the DECC Future Framework on the supply side, and the DETE Industrial Policy, on both supply and demand, need to be wholly aligned. Together they need to provide a clear and detailed Plan, adequately resourced and managed, to attract international companies with the technology and capital we need, to invest in both the supply and demand sides of these targets.

On the supply side, SEETF has already recommended the creation of a National Floating Wind Development Agency, whose sole task is to enable the delivery of the lowest cost power onshore. This is consistent with the EU Green Deal policy and best practice in other countries such as Denmark. This approach is already well proven by IDA and EI for industrial policy deployment in Ireland. On the demand side, SEETF has already recommended that IDA be given resources to develop green energy industrial parks to attract the companies needed to enable the incremental energy supply and demand.

In 2023, at the request of DECC (and An Taoiseach), SEETF worked with all stakeholders on the west coast and published an agreed Plan showing the critical path to deliver power onshore by Q4 2032. The plan describes the critical policy measures, infrastructure developments and offshore project phases that need to happen and by when. No doubt, that schedule could be improved with a cross government approach supporting a National Agency of respected experts working full time, but the reality also is that this Plan is now 9 months late.

With respect to the 20GW by 2040 target, discussions with industry indicate that 5-10 GW can be expected from fixed wind turbine technology. Therefore 10-15 GW, let's say 13, will be required from floating wind technology, delivered onshore, by 2040. If we estimate a best case of wind turbine deployment in late 2033, that leaves 6 years to deploy 13GW, or an average of 2.2 GW per year. To put that into perspective, the 2022 Bechtel Report for Shannon Foynes Port indicated a maximum run rate of 1GW from 2033 and 1.8GW from 2038, and only if significant new port infrastructure is built to enable this. The challenge is therefore both substantial and urgent. SEETF therefore recommends that:

-
1. The Atlantic FLOW Deployment Plan, presented on page 33 of our report¹ showing the critical path of key actions, is reviewed and updated by a new team with the necessary technical and project management expertise. This can become the basis of a credible Plan to achieve the 20GW by 2040 target. The updated Plan then needs to be project managed at a senior level, with cross government sponsorship. As time is longer on our side, if a dedicated national agency is not preferred, then SEETF request that a division of IDA be formed immediately to deliver the implementation of the policy. IDA has extensive experience in attracting international companies and also has a well-respected property division.
 2. Current DECC policy to complete DMAPs in sequence, albeit similar to the work for the SE Coast, will not achieve the 2040 targets. Current indications are that work may begin on a west coast DMAP by 2027. Investors in West Coast projects have been gradually withdrawing resources from these projects since the government's plan lead approach to development was announced due to lack of clarity of locations and lack of timeframes. A parallel DMAP approach is therefore required, with the West Coast DMAP being advanced without delay.
 3. SEETF published its Plan for launch by An Taoiseach with an agreement to complete the west coast DMAP by Sept 2024. This approach was based on desktop DMAPs, as used successfully in the UK and Scotland. However, this agreement was not implemented. Subsequently, there was a Dec 2023 commitment by Cabinet to review accelerating the west coast DMAP but this is not reflected in this Future Framework document. We recommend that the DMAP must be completed by no later than Q4, 2025.

In Q4 2023, SEETF proposed a plan that Clare County Council be appointed and funded by DHLG as the competent body to complete this work, as they already are for the Shannon Estuary and Clare coastline foreshores. We ask that this be seriously reconsidered to ensure that the 2040 target is to be achieved.

For the longer term, we recommend that the principle of delegating foreshore and offshore DMAPs to local authorities, with oversight from appropriate national authorities, be strongly considered as the best way to accelerate deployment with optimum local stakeholder/community engagement and input.

4. The Shannon Estuary be designated as the first location to lead on the deployment of floating offshore wind in the Atlantic and that the proposed infrastructure investments at Foynes and Moneypoint be supported to enable wind turbine supply from as early as possible in the next decade.
5. As indicated above, SEETF foresees that the majority of the incremental industrial demand will be supplied from PPAs with wind developers, from which the State can realise the benefit both directly and indirectly. To support the costs of setting up the greenfield startup of the industry, we recommend a 400-500MW ORESS on a publicly owned site, as per the approach taken in other countries.
6. With respect to the process of awarding the seabed itself, we welcome the plan-led approach and the use of DMAP to map out Ireland's offshore renewable opportunities, however the mechanism to support the allocation of seabed areas at present (i.e. via ORESS 2.1) is sub-optimal, high risk and we fear could ultimately add avoidable 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.
7. To accelerate delivery onshore, we recommend that developers be licensed to build offshore transmission network, which can later be transferred to Eirgrid if desired. On land, transmission to demand centres must be enabled by a combination of private wire and

-
- Eirgrid in a timely manner. SEETF recommends that best practice elsewhere in Europe (Denmark, Netherlands) is deployed where commercial terms for timely grid connections are put in place to reduce risk for all parties, including end use customers.
8. The opportunity to accelerate economic development, using this infinite supply of green power, across Ireland is prioritised. SEETF believes that incremental industrial demand will be a key opportunity but notes that, apart from hydrogen, this was declared out of scope for the consultants in their modelling for the Future Framework policy. We believe that is a fundamental omission and must be corrected.
 9. SEETF recommends that IDA be resourced to develop and market Green Energy Industrial Parks to attract industries to enable the supply of, and the demand for, this power. (The SEETF report on an Atlantic Green Digital Corridor provides more detail on this.)
 10. It is critical that the natural advantage of Atlantic wind, in terms of wind speed and duration, is translated into a sustainable cost advantage for users, both domestic and industrial. To enable that, an aligned masterplan and an efficient ecosystem of supply and support needs to be created in the Shannon Estuary region and along the broader west coast. Technical capability, particularly for Atlantic conditions, must be developed. SEETF recommend the creation of DTIF programmes and an ORE Development Centre to enable that.

We welcome the opportunity to make a submission to this most important policy and, as a government appointed Taskforce, remain available to assist in this enormous economic opportunity for Ireland.

On behalf of the Shannon Estuary Economic Taskforce,

Yours sincerely,



Shannon Estuary Economic Taskforce

References:

- ¹ Shannon Estuary Economic Taskforce Report <https://enterprise.gov.ie/en/publications/shannon-estuary-economic-taskforce-report-july-2023.html>
- ² SEETF estimates incremental industrial demand by 2040 consisting of 7GW for hydrogen based on MoU's already in place, 5GW for data centres and other industrial demand, and 2GW for SAF.
- ³ Report by MaREI in 2021 states that if Irelands aviation fuel demand in 2050 was to be met by e-fuel (synthetic SAF) we would need 7GW of renewable electricity. That is just for Ireland – there are probably 20+ airports in Europe with higher passenger numbers than all of Ireland's airports together and from countries that do not have the potential for renewables.
- ⁴ Bechtel Report for Shannon Foynes Port Company Strategy 2041 <https://www.sfpc.ie/wp-content/uploads/2022/11/Vision-2041-Strategic-Review-Summary-Overview.pdf>