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26.2.2026

**Submission to the Department of the Environment, Climate and
Communications on the consultation 'Offshore renewable energy Future
Framework Policy Statement'**

A chara,

Thank you for consulting the public for feedback on the Offshore renewable energy Future Framework Policy Statement extending to 2050. I am writing as a [REDACTED] and wish the Department well in its plans to develop offshore renewable energy in the years ahead.

The press reported recently (Irish Times 24.2.24 – Panning Issues put climate transition at risk IFAC warns) that not a single wind farm was given planning permission in the state last year). Given that onshore wind can be developed at one tenth the cost of offshore wind there would appear to be more scope for the further development of terrestrial wind farms and sight should not be lost of this potential in the rush to move offshore.

The map of onshore windfarms in Ireland on page 11 of the Irish Renewable Energy Atlas and Guide 2016/2017 (La Tene Maps) indicates that a number of counties have no windfarms and the that there are very few facilities located on the Wild Atlantic Way, apart from the northern section from North Mayo to Donegal. This is despite the adjacent map of wind resources in Ireland showing the coast of the Wild Atlantic Way has the highest average windspeeds.

The Department is aware of the existence of Special Report 23 of the EU Court of Auditors entitled '**Offshore renewable energy in the EU – Ambitious plans for growth but sustainability remains a challenge**' adopted by the Court of Auditors on 5 July 2023ⁱ. The Court of Auditors is an institution of the European Union with institutional provisions set out in Articles 285-287 of the Treaty on the Functioning of the European Union.

The Special Report in its Executive Summary call for the unresolved conflict with fisheries in some countries to be better addressed (paragraph VII); it goes on to recommend action aimed at boosting the development of offshore renewable energy while ensuring environmental and social sustainability (paragraph X).

In its **Conclusions and Recommendations** the Special Report states

- at paragraph 108 – ‘We also found that while the concept of co-using sea space is encouraged, the coexistence of different sectors with offshore renewables is not yet common practice. In particular, the unresolved conflict with fisheries in some countries will have to be better addressed to ensure the coexistence of both sectors.
- in the second half of paragraph 113 - ‘We consider that given the existing human activities at sea and the scale of the planned offshore renewable energy rollout in the coming years, from the current 16 GW of installed capacity to 61 GW in 2030 and beyond, the environmental footprint on marine life may be significant and has not been sufficiently taken into account.’

The Special Report while supporting the development of ORE has fired a number of warning shots in relation to the treatment of the fishing industry and environmental impact. It does not appear from an examination of the Draft Future Policy Framework Document and the associated documents with this Consultation that the Recommendation of the Special Report have been taken on board to any degree and this needs to be rectified if ORE is not to be held up as developments on land have been.

I recommend that competent authority for sea fisheries and related agencies be requested to establish **priority fishing zones** around Ireland as a matter of urgency and that the results be used to identify where offshore renewable energy installation will be permitted under the future plans. These zones should ideally protect the areas providing the top 40% of Irish landings by value, averaged out over a period of about a decade.

Ireland has a long public service history relating to fisheries spanning a period of 205 years from the 1819 Act for the further Encouragement and Improvement of the Irish Fisheries (Geo. III c. 109) and the wealth of knowledge acquired over two centuries should be tapped for the current exercise of developing offshore renewables. The Marine Institute produces maps of ‘Irish Landings from Irish vessels by ICES rectangle’ which should provide a good basis to start on identifying priority fishing zones.

If priority fishing zones are not introduced the risk is that ORE will result in our own fisheries production dropping together with landings from the significant amount of quota allocated to other member states in our waters also dropping. While the draft Future Framework deals more comprehensively with the marine environment than it does with fisheries, I recommend that there be a presumption against ORE in areas which are Protected under Natura 2000 (Birds and Habitats Directives) around the coast.

Yours sincerely,

signed

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ⁱ https://www.eca.europa.eu/ECAPublications/SR-2023-22/SR-2023-22_EN.pdf