



Amazon Web Services Response to Public Consultation on Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy (SC-DMAP)

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Submitted by:

Amazon Web Services EMEA SARL (AWS)

Submitted to:

International and Offshore Energy
Division
South Coast DMAP Submission
Department of the Environment, Climate
and Communications
Tom Johnson House
Beggars Bush
Haddington Road
Dublin 4

Point of Contact:

██████████
Head of Public Policy
AWS Ireland
██████████

Amazon Web Services
2 Charlemont Square
Dublin 2
D02 F6X6

Introduction

Amazon Web Services (AWS) is a longstanding major investor in Ireland. Our presence here began in 2007, when Ireland was selected to become our first infrastructure region outside the US. We have grown considerably since then and AWS is now one of the largest private employers in the country. Our recently published economic impact report, based on research undertaken by Indecon Economic Consultants, established that AWS sustains more than 10,000 jobs across Ireland and that AWS investment has increased economic output here by over €11.4 billion since 2012.

AWS welcomes the opportunity to respond to this consultation. Please note that our response solely addresses consultation question 1.

AWS Response to Question 1

1. Identifying Maritime Areas for offshore wind development

The draft SC-DMAP aims to promote the sustainable development and growth of the maritime and coastal economies and the sustainable use of marine and coastal resources. Government has used an ecosystem-based approach to identify four Maritime Areas within which fixed offshore wind farms may be located in the draft SC-DMAP area. This involves making spatial and policy assessments based on environmental, social and economic data and information, and integrating the views of stakeholders and the public throughout the process. The identification of Maritime Areas has sought to avoid and minimise potential associated adverse environmental impacts, including impacts on biodiversity, EU Natura 2000 sites, and other existing marine users. This has taken place through the comprehensive environmental and technical analysis.

Do you agree with the four maritime areas identified for future offshore wind development in the draft SC-DMAP? If not, why?

AWS fully supports the Government's offshore wind (OSW) goals. Their delivery would provide an abundance of renewable energy that can ensure Ireland's energy security and drive future economic growth. New OSW-produced energy can also help decarbonise Ireland's electricity system and play a key role in achieving the Government's related sustainability ambitions, including a 51% reduction in greenhouse gas emissions by 2030 and reaching net-zero emissions by 2050.

Amazon's own approach to sustainability is aligned with that of the Irish Government. We are already committed to reaching net zero carbon emissions by 2040 and we are now the largest corporate buyer of renewable energy in the world. Amazon is also on track to meet our ambitious goal of matching all of the electricity powering our operations with 100% renewable energy by 2025. In Ireland, we were the first company to deliver unsubsidised domestic corporate power purchase agreements, meaning we are adding renewable energy to the Irish grid without Government support. We have invested in pioneering sustainability initiatives, such as the Tallaght District Heating Scheme which

is providing low-carbon heat to various buildings located near an AWS data centre in South Dublin. And our recent collaboration announcement with Bord Na Móna on its Eco Energy Park in the Midlands has the potential to deliver new sources of renewable generation whilst contributing to low-carbon economic growth.

AWS very much welcomes the actions that have been taken to date by Irish authorities to expedite the delivery of OSW, including the launch of the National Marine Planning Framework, the establishment of the Maritime Area Regulatory Authority, and the publication of the new OSW industrial strategy. The draft South Coast Designated Maritime Area Plan (SC-DMAP) is another step forward in terms of the development of OSW projects – beyond those included in the ORESS 1 process – which we look forward to seeing come to fruition in due course.

With respect to the specific areas set out in the SC-DMAP, we are fully supportive of areas A, B, and C. Area A, in particular, boasts significant potential for OSW projects, given its proximity to the coastline and its shallower water depth. We believe Area A currently represents the most viable avenue for OSW development in the SC-DMAP.

AWS has significant concerns, however, with the proposed boundaries of Area D. As currently set out, Area D conflicts with the intended route of the AWS-commissioned Beaufort submarine fibre optic cable system which will provide low latency, scalable and resilient international connectivity between Ireland and the UK. A foreshore license (ref: FS007361), submitted via the entity Amazon MCS Ireland Limited (AMCSIL), was granted in December 2023 in respect of this Beaufort system. This license covers the cable's route between its installation at Kilmore Quay in County Wexford to the edge of the twelve-mile limit (12 nautical miles, approximately 22.24 kilometres) at a point which is currently at the very north-west tip of Area D. AWS (as AMCSIL) is currently in the process of applying for a Maritime Area Consent (MAC) (application reference: MAC240030) for the remaining portion of the cable through Irish exclusive economic zone waters which would traverse seabed which is now included in the proposed Area D. (This MAC is required due to an alteration to the route that was originally authorised through the foreshore license.) The entirety of the Beaufort route already completed a full geophysical marine survey in 2023.

As highlighted by the Department of Environment, Climate and Communications (DECC) in its recently published separate consultation on international connectivity for telecommunications, submarine fibre optics cables, such as the intended Beaufort project, are the foundations of global internet infrastructure. Simply put, they enable the internet connectivity and digital tools that society and international economies are increasingly reliant upon. Ireland, as both a global digital hub and island nation, is particularly dependent on such infrastructure. The Beaufort cable represents a major new project in that respect – especially as existing in-service systems running into Kilmore Quay are approaching end-of-life – and we submit that it is in the interests of all parties that it not be compromised.

Unfortunately, the potential conflict with Area D may, if unaddressed, render the Beaufort cable unworkable, primarily as it would not be maintainable. If OSW-related infrastructure were to be installed in Area D in future, it would create an excessive risk that the Beaufort cable system would be damaged. A re-routing of the cable to bypass Area D would also not represent a viable solution as it would either become excessively long (which would generate a range of performance-related problems) or would have to navigate through sand wave fields which pose an installation and system integrity risk. A substantial re-routing would, in fact, be tantamount to an entirely new cable project, entailing environmental appraisals, re-surveying and permitting. These processes would together cause significant delays of over two years beyond the current timelines, with implications for suppliers, service-providers and customers who are dependent on this project. It is the case too that building works have already begun to support the landing of the cable at Kilmore Quay.

With that in mind, AWS respectfully requests that consideration be given to reviewing and altering the boundaries of Area D or alternatively providing for a corridor within it to allow for the safe passage and maintenance of the Beaufort and any other future submarine cable systems. We are available to work with DECC to examine a variety of potential solutions in that respect. We are confident that a solution can be rapidly found which would both preserve the integrity of the Beaufort cable while also safeguarding the long-term potential of the area to support the maximum number of OSW projects possible.