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Mr. John McCann,
Sustainable Energy Authority of Ireland,
Wilton Park House,
Wilton Place,
Dublin 2.

29th June, 2015

By email to john.mccann@seai.ie

IWEA Response to the SEAI Strategic Plan to 2020 Public Consultation

Dear John,

The Irish Wind Energy Association (“IWEA”) is Ireland’s leading renewable energy representative body and as such has an active interest in the potential for renewable energy, and in particular wind energy, in Ireland. IWEA works as a proactive stakeholder and partner to the work of the Sustainable Energy Authority of Ireland, and this submission to the next strategic plan is part of our continuing positive engagement, and is intended to contribute actively towards future strategy.

We welcome the opportunity to contribute to this consultation. The period covered by this strategic plan to 2020 will be one of the most critical periods in Ireland’s sustainable energy development and marks a crucial opportunity for Ireland to lead internationally on our approach to decarbonisation and clean energy development to 2030 and beyond.

IWEA will respond directly to the four questions as posed by the SEAI, and will within the context of these four questions also seek to set out some wider issues which we consider should be addressed within the strategic approach of the SEAI to 2020 and beyond.

Our thanks again for the opportunity to contribute and we would welcome the opportunity to speak with you further as the work on the SEAI Strategic Plan progresses.

Yours sincerely,

**sent by email, bears no signature*

Brian Dawson,
Communications Manager,
Irish Wind Energy Association.

IWEA Response to the Questions as Posed in the SEAI Strategic Plan Consultation

Q1. What do you believe are the key issues facing Ireland with regard to energy and climate issues?

(A) The need to promote public understanding and acceptance of the need for our energy transition.

As a small island economy on the western fringes of Europe, climate change and its relationship with energy represents one of Ireland's greatest challenges, with an energy import dependency of over 85% in 2014 costing over €6bn per annum. Ireland is already experiencing the damaging effects of climate change, and impacts are predicted to become increasingly severe. The focus and emphasis on the need for a comprehensive societal approach and long-term solution for decarbonising our energy supply needs to be engrained in the public discourse across communities, industries, local and central government and our society as a whole.

It is not just industry or business who must have this conversation, everybody needs electricity. In modern life we are all consumers of energy. We use energy to feel comfortable at home, to heat or to cool rooms, to light them, to wash, to cook and to eat, to entertain, to move, to travel. Whatever our jobs and activities are, we all use energy to meet different needs and desires. Today it is hardly imaginable to live without electricity. However the link between where our energy comes from and our electricity needs is still all too often an abstract one, and the link between our role as 'energy citizens' and our climate challenges is not being made with enough frequency or consistency.

(B) Ensuring our Natural National Strengths are Brought to the Fore in our Energy Transition.

As a sector which is now over 20 years old, wind energy in Ireland has been developing in parallel with the growing understanding and acknowledgement of importance of climate issues, security of supply concerns, and our Irish need to make a transition to a low carbon economy and power system.

Within the 2020 EU Climate and Energy targets now on the horizon, the 2030 climate and energy policy under development, and the prospects of a global agreement on Climate Change to be reached later this year in Paris, it is vital that action on sustainable energy is pursued more urgently than ever.

The global focus on sustainable energy brings with it immense opportunities for Ireland given the resource we have in terms of our wind and other renewable capabilities. Ireland has sufficient accessible onshore wind energy resource to meet but also exceed our current renewable electricity target of 40% by 2020. In the longer term, Ireland has a landmass of around 90,000 square kilometres, but a sea area of around 10 times that size, at 900,000 square kilometres. Ireland's position at the Atlantic edge of the EU gives an almost unparalleled offshore energy resource, with suitable conditions available for the development of the full range of current offshore renewable energy technologies. Electrifying our energy requirement is therefore a logical route for Ireland.

There needs to be an increased emphasis on a fact-based discussion of our energy choices, with an emphasis on the national strengths we enjoy and on the relative economic merits of clean energy options. The wind energy sector, which is today delivering almost 20% of our national electricity and is acknowledged as the most cost effective current renewable option for Ireland, would welcome this kind of open and transparent discussion.

(C) Ensuring Positive Policy Leadership for our Energy Transition:

The challenge of our Irish climate and energy future is not a short term fix. This is an issue where there must be a continuity and stability of policy towards achieving overarching long term goals beyond political cycles. There is a need to ensure that local and national objectives work hand in hand on important and cross cutting issues, such as tackling climate change and promoting the use of renewable sources of energy. The work of the SEAI is crucial in this regard, and in particular we consider that supporting positive political leadership both local and national level is also vital.

In order to ensure the maintenance of public support for our low carbon transition, as well as to ensure the necessary external and private investment for projects, we must ensure a coherent and sustained policy direction. Recent announcements from Apple and Facebook of their intention to invest in Irish renewable energy to power Irish based data centres, worth over €1bn, flags once again the clear benefits both environmental and economic which can be made as part of our energy transition. This kind of renewables based FDI also complements the existing commitment made through direct local investment, job creation, as well as increased local authority income through commercial rates, development contributions and other community benefits.

(D) Engaging Communities Proactively, Consistently and Positively towards our Energy Transition.

IWEA and our members have long recognised the need direct engagement with communities across the country on the need for the wind energy as an indigenous Irish energy source. IWEA has been a leader in developing best practice in community guidance around wind energy developments, including the following:

- The Best Practice Guidelines for the Irish Wind Energy Industry (2012)¹
- Good Neighbour: IWEA Best Practice Principles in Community Engagement & Community Commitment (2013)²

Our commitment to proactive engagement has continued apace this year, for example, IWEA has launched a new consumer facing website www.windfacts.ie to seek to inform people on the benefits of Irish wind power. Also this June IWEA and our members invited communities across the country to visit local wind farms. This invitation was taken up by almost 2,000 people during the month, and saw people engaging positively and learning about the benefits of wind and renewable energy to our country and our communities.

In our approach to project development, IWEA emphasises that community engagement should begin at the earliest possible stage and continue through each relevant stage of the project and beyond. In our guidance IWEA emphasises that *'The dialogue undertaken by*

¹ <http://www.iwea.com/index.cfm/page/iweabestpracticeguidelines?twfId=1076&download=true>

² <http://www.iwea.com/index.cfm/page/iweabestpracticeprinciplesinco?twfId=1236&download=true>

stakeholders during the development of onshore wind energy projects should be inclusive, transparent, accessible and accountable.'

As well as the work done by project promoters, IWEA consider that more resources must be made available through the work of the SEAI and through bodies such as local energy agencies to provide local information, local contact points and a factual information partner on positive energy choices. IWEA considers that there must be a stronger focus on building community understanding and engagement around the range of sustainable energy options and associated infrastructure, through a range of direct engagements focused towards, schools, workplaces, community groups and organisations, business groups and voluntary organisations among others. There are many opportunities for people to become involved in the energy transition through the development of local projects, however the access to accurate and impartial information can prove to be a significant barrier to getting projects off the ground. IWEA has made an effort to address this through the publication of the "[IWEA Wind Microgeneration Step-By-Step Guide](#)". We believe that SEAI has an important role to play in the provision of accessible information.

While the SEAI has a key role in promoting this discussion, they must also facilitate the Government in this regard, to ensure that the societal debate and discussion is focused on the wide issues of Irish renewable development and deployment, and that SEAI resources are allocated proportionally to the range of Irish renewable energy approaches.

It is necessary that the Government steps out with clear explanations and communication on how EU targets are being approached, the need for energy infrastructure and the specific Irish approach to reducing carbon emissions. Ultimately it rests with the Irish Government to show leadership on this area, however we would support a strong role for the SEAI in supporting and facilitating the Government in this important work.

Q2. Our current vision is to make Ireland a recognised global leader in sustainable energy. A society fully engaged in the sustainable energy agenda and an economy fully exploiting the global opportunities in clean, low carbon solutions. Do you feel this vision is understandable and relevant? Does it hold the right level of ambition?

IWEA welcomes the clear intent and ambition indicated through this vision, however we would make a number of comments, as we feel that this vision should also evolve beyond the previous strategic vision:

- The vision going forward for the SEAI, must ensure a focus on the role which all citizens and communities need to play as proactive participants in achieving our sustainable energy ambitions.
- The vision must acknowledge that for the transition to low carbon energy to enjoy public support costs have to be kept down and impacts on the environment have to be minimised. In this regard, indigenous wind power has a big contribution to make. Wind power has been recognised by the SEAI and by policy makers as the most cost-effective Irish renewable energy technology, and has made a significant contribution to reducing Ireland's greenhouse gas emissions and providing clean, low carbon energy.
- Within the vision, IWEA believes that there should be a clear acknowledgement of the crucial period which this strategy covers to 2020, the need to focus on the delivery of

EU 2020 Climate and Energy targets. The period to 2020 and beyond to 2030 also matches a period of sustained global efforts to tackle climate change through responsible energy use.

- IWEA considers that this vision must be matched by clear series of benchmarked actions towards clearly stated policy goals, which should be developed in line with the 2020 and subsequent 2030 climate and energy targets.

Q3. If you have had an interaction with SEAI in recent years, how would you describe your experience?

IWEA counts the Sustainable Energy Authority of Ireland as a key stakeholder and partner, and in that regard has a regular and positive engagement with the SEAI. The experience has always been one of positive engagement and proactive sharing of experience and knowledge. We look forward to continuing and expanding upon this positive engagement.

Q4 Is there anything else (comments) you think might be useful for us to consider as we develop our strategy?

In developing the strategy for the period to 2020, IWEA would make a number of proposals to further improve and develop the work of the Sustainable Energy Authority of Ireland.

Mainstreaming Our Sustainable Society:

Raising awareness of our energy challenge and the linked issues of climate change cannot be a matter for one agency or one department or one local authority, but must be taken as a systemic and holistic challenge to improve access to energy information. Energy, its availability, ease of use, security and cost should not be taken for granted in an island society that imports 85% of our energy needs. While we welcome and respect the clear leadership and contribution which the SEAI already makes to this issue, we would stress the need for further focus on efforts to mainstream the issue across local and central government, to lead but also to empower others to champion the need for our sustainable society.

Finally we believe there must be a key role for the SEAI in R&D along with Enterprise Ireland, Science Foundation Ireland to develop industry/research collaborations around renewable energy.

Ensuring Commitment to our Commitments:

The next period marks the run in to the EU 2020 targets. The strategy and vision must present a clear commitment to achieving these binding commitments and accelerating the growth of renewable electricity, transport and heating to ensure that momentum is not lost.

The further increased electrification of heat alongside the electrification of transport are both key necessary developments for the next period.

With this in mind and in line with the EU roadmap, we would further call for a key focus to be the electrification of heating and transport with measures such as:

- The introduction of grants for heat pumps
- Announcements around the phase out of grants for carbon intensive home heating systems.

- Removing obstacles in the BER and Building Regulations against electrification
- Promoting the development of a cadre of heating technicians who have the skills to carry out these installations to the required standard
- Also continue to promote Electric Vehicles to move to the tipping point reached in other EU countries

There must be a continuing determination to ensure and identify the best, most suitable and most cost effective national approaches to meeting these goals. In doing this we must mirror the longer term view being taken within the upcoming White Paper and this SEAI strategic view must look forward to our collective approach and actions to 2030, with a view to 2050.

Maximising Research and Publications:

We suggest that the SEAI must continue its strong work in publication of research on renewable energy in Ireland. These reports provide a strong and crucial factual base for the discussion of our renewable choices.

IWEA would propose that key focuses for future research would include, for example:

- Work in support of enabling technologies for wind and other renewables within the specific Irish context
- Examining the positive economic and social impacts of wind and renewable energy to the Irish energy consumer
- In the wake of recent announcements by Facebook and Apple in support of Irish renewables, measuring and establishing the role which our sustainable energy is playing in welcoming, supporting and maintaining Foreign Direct Investment in new technologies in Ireland
- The role which emerging internet technologies, such as the “Internet of Things” can play in maximising the use of sustainable energy in our homes and lives
- The contribution which more mature technologies such as wind energy can play towards supporting Irish progress towards the 2020 and 2030 targets, for example in the area of heating and the positive continuing contribution which can be made towards the 2030 EU targets by indigenous renewable energy sources

Building Capacity in Local Government:

We ask that a further focus be placed on working closely with Local Authorities around the country. We note the positive contribution of the Methodology for Local Authority Renewable Energy Strategies (LARES)³ as developed by the Sustainable Energy Authority of Ireland (SEAI) at the request of Local Authorities, and propose that in the period to 2020 that the work in pressing for the use of this LARES approach, towards proper and strategic planning for renewable energy be further emphasised and built upon.

Remaining Ambitious, Driving Ireland’s Leadership:

Ireland is proving a leader in wind and renewable energy. IWEA suggests that the SEAI take a much more upfront role in championing Irish achievements in this area. The development of renewables on our small Island Grid has seen us emerge as a global leader in integration of renewables. The coming years will see further steps forward in technologies around renewable integration, renewables storage and smart grids in Ireland, the SEAI must support

³ http://www.seai.ie/Publications/Renewables_Publications_/Wind_Power/Methodology-for-Local-Authority-Renewable-Energy-Strategies.pdf

this leadership and must ensure this success is acknowledged and recognised. There must be a key ambition to ensure that we accelerate and support the development and adoption of technologies to further empower indigenous renewable energy sources.

Empowering the SEAI to Reach Out Further:

There must also be leadership shown by Government to further empower the work of the SEAI. The necessary resources must be put in place to ensure a positive role is in place in the network of local energy agencies and invigorate awareness raising through schools, through community engagement and consultation on key energy policy decisions and through support for community energy schemes as well as through proactive media engagement and outreach.

In conclusion, we thank you for the opportunity to make this submission, the SEAI represents a key actor in Ireland's progress to a low carbon future. IWEA remains committed, as represented by this submission, to continuing our existing positive engagement with the SEAI and to working actively towards our low carbon future.