

***JOINT
DECLARATION
ON ACCELERATING
RENEWABLE ENERGY
WHILE ENSURING
ENVIRONMENTAL
PROTECTION***



INTRODUCTION

Environmental NGOs and the renewable energy industry support the need for urgent action on both the climate and biodiversity crises. It remains clear that the State must accelerate the energy transition, rapidly moving to renewable energy sources and phasing out fossil fuels in accordance with Ireland's legally-binding pollution limits, the national carbon budgets adopted by the Oireachtas in 2022.

The delivery of 9GW of onshore and 5GW of offshore wind energy, as well as 8GW of solar energy, and the associated delivery of electricity grid infrastructure, are critical to staying within the electricity sector's emissions ceiling for 2030 and, over time, delivering an entirely renewables-based system, which will be supported by battery storage, interconnection, as well as green hydrogen from renewable energy. The successful delivery of renewable energy is also essential to radically reduce dependency on expensive and polluting gas, oil and coal, and to ensure a successful fossil fuel phase out in the electricity system as soon as possible.

In parallel, given the ongoing biodiversity crisis, this urgent action must equally involve immediate, coherent and comprehensive policy measures to ensure environmental protection, as addressed in the Citizens' Assembly on Biodiversity Loss in 2023. Renewables and grid development must go hand in hand with enhanced nature protection and restoration, improved community engagement and public participation. By integrating nature protection and restoration into energy strategies and the development of renewables

and electricity grid infrastructure, Ireland can ensure that the transition to renewable energy also contributes to preserving natural heritage for future generations.

Over the past 3 years, environmental NGOs, the renewable energy industry and grid operators have discussed the challenges and opportunities associated with Ireland's energy transformation as part of a project called 'Our Energy Future'. Organisations have specifically addressed how Ireland can improve environmental assessment and biodiversity protection while delivering the necessary infrastructure to meet climate and renewables targets.[1]

In October 2023, environmental NGOs and the renewable energy industry produced a joint pre-Budget statement which called for greater funding to be allocated to environmental protection, restoration and monitoring as part of the delivery of renewable and grid infrastructure.[2] The statement highlighted a lack of environmental capacity in State agencies, which is undermining the achievement of renewable objectives and compliance with environmental law, and a lack of resources among environmental NGOs which means they are often prevented from substantially engaging in the planning and development process.



1. See <https://www.friendsoftheearth.ie/get-involved/projects/our-energy-future/>

2. See

https://www.friendsoftheearth.ie/assets/files/pdf/joint_statement_on_government_investment_in_environmental_capacity_-_oef.pdf

INTRODUCTION (CTD)

The State has a poor track record of compliance with national and international environmental law across relevant sectors. Environmental NGOs and the renewable energy industry have consistently highlighted a number of weaknesses in environmental monitoring, assessment, data collection, as well as public communications and consultation.

Meanwhile, while significant progress has been made in the electricity sector, it is likely that Ireland's electricity emissions will exceed its sectoral ceiling as part of the first carbon budget.^[3] Renewable energy projects are not being deployed at the pace or scale required often due to significant challenges in the planning system. Security concerns relating to fossil fuels have also increased pressure for near-term rollout of renewables and grid infrastructure.

Nature restoration and the renewable energy transition must be planned and implemented hand-in-hand so they can jointly support each other in delivering Ireland's climate, biodiversity, and energy goals.^[4]

We have therefore produced this joint declaration with recommendations to Government on how to respond to, and ultimately resolve, these challenges, across 5-main areas:

1. Nature-Inclusive Acceleration of Renewable Infrastructure
2. Transparent, Up-to-date and Accessible Environmental Data
3. Inclusive Stakeholder Engagement
4. Enhanced Permitting & Planning
5. Investment in Environmental Education

Recommendations across these 5 areas should be considered collectively as an integrated response to the above-mentioned challenges

The twin climate and biodiversity crises demand not only urgency of action but also solidarity and new ways of thinking. Environmental NGOs and the renewable energy industry wish to support, and collaborate with, all levels of Government in delivering an inclusive, nature-friendly energy future, consistent with this joint declaration.



3. See <https://www.seai.ie/news-and-events/news/energy-in-ireland-2024>

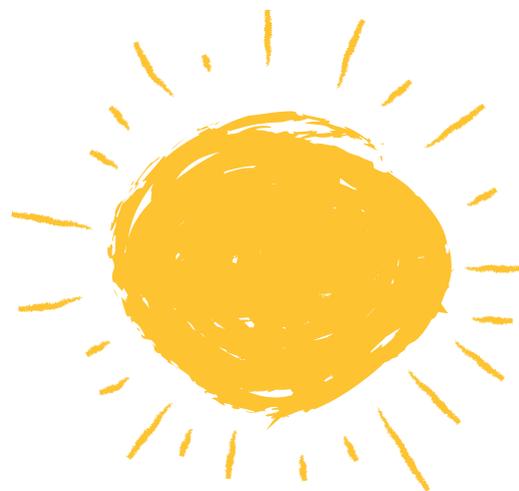
4. OCEAN '10 Recommendations How to improve Maritime Spatial Planning to reach European climate, energy and biodiversity targets' Oct 2022
https://offshore-coalition.eu/publications/documents/final_ocean_msp_recommendations.pdf

1) NATURE-INCLUSIVE ACCELERATION OF RENEWABLE INFRASTRUCTURE

The Government should prioritize the accelerated rollout of renewables and grid infrastructure in line with Ireland's carbon budget obligations, while ensuring compliance with environmental law, minimizing impacts on associated ecosystems and biodiversity, and implementing transparent environmental assessments, as well as mitigation and monitoring throughout development.

The Government should prioritise new policy measures, including:

- a) Accelerate the rollout of renewable and grid infrastructure in accordance with Ireland's legally binding carbon budget programme.
- b) Continue to ensure environmental protection and minimise negative impacts on ecosystems and biodiversity as part of the development process.
- c) Ensure compliance with existing environmental law and renewable energy law in a transparent manner from project proposal through to post-project monitoring.
- d) Assess impacts on the environment of renewables and grid development in accordance with national and EU obligations and introduce mitigation measures and monitoring as necessary.
- e) Compile improved guidelines for habitats and species surveys in renewables projects to ensure robust ecological assessments within clear timeframes, without risking undue project delays.
- f) Support the development of full, transparent and holistic spatial planning, coupled with sensitivity mapping, in order for the impacts of renewables and grid infrastructure on ecosystems and biodiversity to be recognised and avoided and minimised as early as possible in the planning process.^[5]

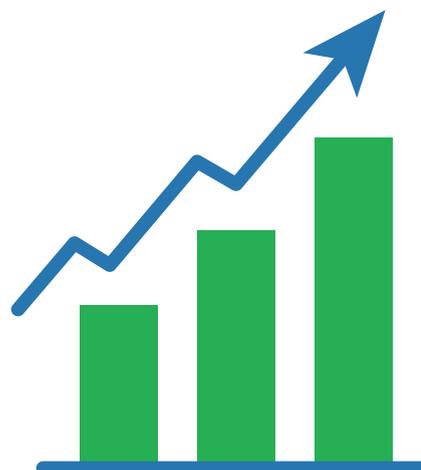


2) TRANSPARENT, UP-TO-DATE AND ACCESSIBLE ENVIRONMENTAL DATA

In order for the impacts of infrastructure on ecosystems and biodiversity to be avoided and minimised, the Government should establish a comprehensive, standardized, and accessible framework for environmental and marine data collection and sharing, integrating open data initiatives and stakeholder collaboration, supporting nature-friendly renewable planning while respecting commercial sensitivity.

The Government should prioritise new policy measures, including:

- a) Introduce a clear national strategy on environmental and marine data-gathering and data sharing, which takes account of the need to identify data gaps, refine standards and address issues with access to existing State-held data, while respecting commercial sensitivity.
- b) Respond to the Government's Open Data Strategy 2023-2027 and build upon progressive measures in Ireland such as EirGrid's sharing of ecological data with the National Biodiversity Data Centre.
- c) Introduce improved methodologies, baselines and/or metrics for such data-gathering on the basis of consultation with all stakeholders on the kinds of data which must be collected to support appropriate environmental protection measures.
- d) Ensure that up-to-date environmental data is centrally hosted, standardised, and made publicly accessible through integrated Open Data systems, while respecting commercial sensitivities and providing resources for timely access.
- e) Identify, in as much as available data permits, areas where the development of renewable energy and grid infrastructure may impact sensitive species through technology specific wildlife sensitivity mapping using Geographic Information Systems (GIS) to collate, analyse and display spatial and geographic data and employ spatial biodiversity data relating to species and/or sites.



3) INCLUSIVE STAKEHOLDER ENGAGEMENT

In order to build awareness and counter misinformation, the Government should lead a national dialogue on accelerating renewable energy, combined with a public information campaign. Greater state resources should be dedicated to early consultation and stakeholder engagement processes to address community concerns as early as possible.

The Government should prioritise new policy measures, including:

- a) Deliver a meaningful national dialogue with all relevant stakeholders on rapidly moving to renewable energy sources broken down into specific topics to allow comprehensive stakeholder engagement. This should be a State-led process and build on existing structured engagement with relevant taskforces. It should also seek to learn from and promote the Our Energy Future project as a template to be progressed at national level.
- b) Deliver a coherent state-led public information campaign to enhance public awareness of the need to rapidly respond to the climate and biodiversity crises, increase public support for the energy transition, and equipping everyone to engage in decision-making, particularly relevant communities
- c) In order to raise the transition on the public agenda and incentivise participation by all relevant stakeholders, explore new communications initiatives across Government including official notices, social media, print media, television and radio.
- d) Counter disinformation and provide independent, evidence-based information on the need for urgent decarbonisation of the energy system, while protecting the environment, and the importance for quality of life. This could include the production and circulation of easily accessible and evidence-based information for the public from relevant state bodies, learning from the Government's response to the COVID-19 pandemic.
- e) Prioritise early structured Government and public body consultation processes on aspects of energy and climate policy (before decisions are made), mindful of limited resources available in certain organisations to respond to requests for feedback.

- f) Publish and continuously update the timeframe and all relevant and available information in an accessible format, including publication of calls for evidence submission of additional relevant information. Official notices of participation opportunities should be raised by Government and state bodies across a multitude of media types, and participation timeframes should be adequate. Consultations from Government and state bodies should be presented in a variety of formats, e.g. visualisations, plain-English summaries, etc. Consultation notices, materials and response options should be made fully accessible.
- g) Seek to remove regulatory and financial barriers to the development of local community-owned renewable energy projects and revisit the question of shared-ownership opportunities for developer-led projects, which has proven successful in other countries at facilitating public participation in the energy transition, while being careful the introduction of such schemes does not unfairly distort competition or significantly increase electricity prices.



4) ENHANCED PERMITTING & PLANNING

The Government should accelerate enhanced and coordinated planning for renewables and grid development by incentivising nature-inclusive design, and instigating coordinated actions among relevant policy areas and stakeholders at national and community level.[6] Accelerating the permitting procedures – and ensuring streamlined processing of project applications while maintaining thorough environmental assessments and public participation – is critical to meeting Ireland’s renewable and climate targets. The Government should deliver this by properly resourcing the permitting and planning process at all levels and give greater certainty of timelines for project development, while ensuring access to justice and meaningful participation in accordance with the Aarhus Convention and in compliance with environmental law.

The Government should prioritise new policy measures, including:

- a) Properly resource the permitting and planning process at all levels and give greater certainty of timelines for project development, while respecting appropriate timeframes for public and community engagement, in order to accelerate the delivery of renewable energy and grid while ensuring access to justice and meaningful participation in accordance with the Aarhus Convention and in compliance with climate and environmental law.
- b) In partnership with relevant Government Departments and state agencies, such as An Bord Pleanála, the NPWS, MARA, EirGrid and local authorities involved in planning and environmental assessment of renewable energy and grid, survey the number and type of staff they will need to achieve Climate Action Plan targets, in particular new ecologists and EIA specialist positions.
- c) Based on this review of staffing needs, increase funding for relevant Departments and agencies and also resource a fast-track recruitment process for key state bodies that are on the critical path to delivering a zero-carbon electricity system and protecting and restoring nature.
- d) Ensure each local authority has long-term funded positions for at least one officer/analyst in each of the following areas: ecology, heritage, climate action, in line with the operations of the local authority and the associated geographic area.
- e) Incorporate sufficient ecological expertise in decision-making regarding planning and nature-inclusive design and restoration practices in relevant state authorities.
- f) Develop greater state capacity and resources to support local dialogue and community engagement regarding the development and implementation of renewables and grid policy in order to address concerns at an early stage, prevent misinformation and take advantage of community-based responses to local environmental challenges

6. https://renewables-grid.eu/fileadmin/user_upload/Files_RGI/Event_material/2024_10_StrongWinds_ThrivingSeas_Conference/OCEaN_Statement_Achieving_nature_and_people_friendly_offshore_wind_and_grids.pdf

5) INVESTMENT IN ENVIRONMENTAL EDUCATION

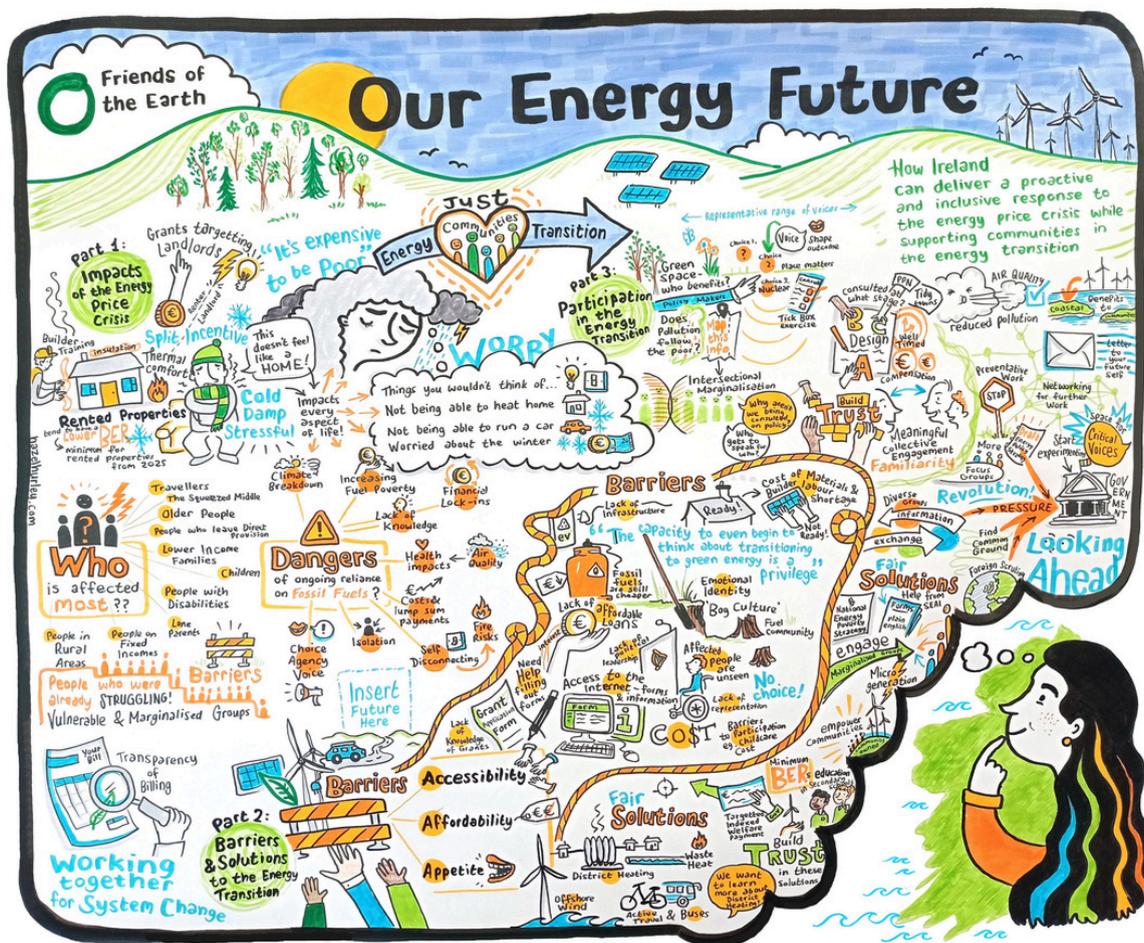
There is a critical shortage of skilled personnel to effectively assess, protect, and respond to renewables development and environmental challenges. The Government should establish dedicated funding and collaborative initiatives to enhance training, upskilling, and resource allocation for public bodies, conservation organizations, and professionals in environmental assessment and protection in the context of rapid renewables development. It should also develop targeted educational programs and civil society funding to address expertise gaps and promote environmental stewardship.

The Government should prioritise new policy measures, including:

- a) Introduce a new dedicated funding stream to support training and upskilling of existing staff in public bodies involved in carrying out environmental assessments.
- b) Improve skills of relevant staff and ecologists, including for environmental assessments, through increased collaboration with relevant professional bodies including the Chartered Institute for Ecology and Environmental Management (CIEEM).
- c) Develop third-level training programmes and modules to promote environmental protection, restoration, and renewables for students and those changing career; additionally, create targeted courses on biodiversity, nature-inclusive design, and planning to address expertise gaps, support micro-accreditation, and guide career development for teachers, as well as second and third level students.
- d) Explore the establishment of a long-term state funding stream for science, research and policy focused conservation organisations in order to overcome significant staff and resources gaps which often prevent them meaningfully engage in ecological research, active conservation, infrastructure consultation and planning processes.



JOINT DECLARATION ON ACCELERATING RENEWABLE ENERGY WHILE ENSURING ENVIRONMENTAL PROTECTION



This joint declaration stems from workshops organised by Friends of the Earth as part of 'Our Energy Future' - a 3-year collaborative project of EirGrid, Friends of the Earth and the Renewables Grid Initiative to engage communities and groups on Ireland's energy transition.

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