



**Scoping for the Strategic Environmental Assessment on  
Plans to Develop Offshore Renewable Energy**

## **Coastal Concern Alliance**

Coastal Concern Alliance (CCA) is a voluntary body set up by concerned citizens in 2006 to campaign for:

- Reform of the outdated, undemocratic Foreshore Act 1933 governing construction in Irish waters
- Introduction of a modern system of marine spatial planning based on the ecosystem approach, in line with EU policy.
- Introduction of integrated coastal zone management to manage the land/sea interface.

The future of Ireland's coastal zone is a matter of great importance to many ordinary Irish people who have no voice on this issue because of the serious democratic deficit embodied in our outdated foreshore legislation.

CCA supports the building of offshore renewable energy projects in Irish waters to help Ireland meet national energy objectives. However we believe that such installations must be to a proper scale and properly sited to avoid damaging impacts on coastal landscapes and the marine environment.

Coastal Concern Alliance has no political or industry affiliations.

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## BACKGROUND NOTE

**Coastal Concern Alliance is concerned at the longstanding legislative and regulatory failure surrounding Irish foreshore administration which is jeopardising Ireland's natural heritage. Key concerns are set out below:**

- Ireland's **Foreshore Act 1933** confers sole authority on the Minister for the Marine to award foreshore leases for construction in Irish waters with no statutory involvement of local authorities and no public right of appeal. It has long been acknowledged by all political parties that this outdated and undemocratic legislation is in urgent need of reform and that new "fit for purpose" legislation and regulations must be introduced to ensure that development in our coastal waters is sustainable. The ongoing democratic deficit has enabled developers to obtain valuable foreshore leases for construction of two of the largest offshore wind farms in the world, totalling 1620MW, off the Wicklow coast in a low key manner entirely inappropriate to the size and scale of the developments and their widespread economic, social and environmental impacts. It is our view that these consented developments are inappropriately sited and have been inadequately assessed. (At the end of 2005, a total of **1620MW** of offshore wind power had been **approved off Wicklow**, 60% more than the **1000MW** of offshore wind power then **installed worldwide**)
- CCA is of the opinion that in granting these extensive foreshore leases and in continuing to consider lease and license applications for offshore wind farms under the Foreshore Act 1933, Ireland is in breach of key provisions of the **consolidated EIA Directive**, notably Article 10A. The European Court of Justice (Case Number C427/07, Commission of the European Communities v Ireland), has found that Ireland is in breach of the consolidated EIA Directive by failing to have in place access to a review procedure of decisions to grant consent "*which is fair, equitable, timely and not prohibitively expensive*".
- The lack of an appeal procedure in relation to foreshore planning decisions, inter alia, has prevented Ireland from ratifying the **Aarhus Convention** on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters.
- It is also our considered opinion that Ireland has breached **Directive 2001/42/EC (the Strategic Environmental Assessment Directive)** transposed into Irish law in 2004, by awarding in 2005 a foreshore lease for construction of the 1100MW Codling Bank Wind Park (200 x 5MW turbines) without first putting in place a plan or programme which could provide the framework for strategic environmental assessment. This development combined with the 520MW Arklow Bank(200 x 5MW turbines) consented in 2002, will have significant environmental impact on the Wicklow coastline, a wildlife rich area designated as an Area of Outstanding natural Beauty . The cumulative impacts of these massive developments have not been comprehensively assessed.

- In the absence of any spatial plan or formal strategic environmental assessment, developers seeking valuable foreshore leases have been allowed to stake their claim to extensive sites in Ireland’s sensitive inshore zone, on “**a first come first served basis**”, with **no competitive tender**. This “free for all”, totally at variance with practice in other EU countries, has led to a significant number of applications for foreshore leases for offshore wind farms, on wildlife rich, in-shore sandbanks, all the way down Ireland’s east coast and in Galway Bay. The offshore wind farms consented and proposed are out of line with good practice with regard to size, scale and proximity to sensitive coastlines.
- Once a foreshore lease has been granted, it can be sold on the international market at a price based on consented megawatts, netting significant **windfall profits** for the original promoters. The two extensive foreshore leases granted off Wicklow for the Arklow Bank and the Codling Bank were both sold on in 2008 to international utilities by the original Irish promoters. CCA is concerned that speculation rather than environmental protection has been the driving force shaping the future of Ireland’s coastal zone.
- We trust that the upcoming **Strategic Environmental Assessment**, carried out with appropriate stakeholder involvement, will redress this balance and help to ensure that offshore renewable energy projects are appropriately sited and adequately assessed.

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# Coastal Concern Alliance

## Comments & Recommendations on Scoping Document

**CCA is of the opinion that marine conservation and protection must be the guiding principle underlying decisions on offshore renewable energy development. We agreed with the Scope as set out in many sections. In others, we have comments and recommendations to make which are set out below:** (NOTE: Numbers refer to Section Numbers in the scoping document.)

### 3. Overview of the Offshore Renewable Energy Development Plan (OREDPP)

The scoping document states:

*“At this stage plans for the development of offshore renewable energy resources are not very well developed”*

#### **Comment**

CCA is aware of no evidence based, strategic plan to develop offshore renewable energy. We view this as a fundamental flaw at the foundation of the SEA. The sole basis for the SEA appears to be the target of 40% electricity from renewables by 2020 set out in the Government document *Building Ireland’s Smart Economy (2008)*.

The scoping document states *“Given the White Paper’s forecast for gross electricity consumption by 2020, there will need to be an installed capacity of approximately 2,500MW of wind power to meet the 40% target”*.

This non binding, self imposed 40% target has been widely queried, notably by the Irish Academy of Engineering (IAE) ‘Review of Ireland’s Energy Policy in the Context of the Changing Economy’, June 2009 (See Appendix for IAE Summary of Recommendations).

#### **The IAE Executive Summary states:**

*“The policies which Ireland is currently pursuing ...were developed at a time of very positive economic growth. A central thesis of this report is that these policies must now be changed and changed radically and quickly to accommodate to the new economic reality in Ireland”*.

*“The challenge is to select our policies based on sound ,evidence - based research and provide a balanced implementation aimed at optimising overall national welfare”*.

*“The Academy supports the Government’s policy efforts to meet Ireland’s obligation of obtaining 16% of its energy from renewables by 2020 but cautions that targets such as 40% of Ireland’s electricity generation from wind by 2020 will only be achieved at an unacceptably high economic cost for our industries in competitiveness terms . This is particularly so following the recent drop in electricity demand and the decrease in fossil fuel prices”*.

*“The target of 40% renewables appears to arise from the All Island Grid Study. The study is based on a number of very critical assumptions which the study itself points out need further examination. In particular:*

- *In its key conclusions section the authors recognise the significant limitations of the study stating: “The limitations of the study may overstate the technical feasibility of the portfolios analysed and could impact the costs and benefits resulting. Further work is required to understand the extent of such impact.*
- *The study is based on typical pre-crisis economic scenarios which are entirely unrealistic in relation to current projected electricity demand growth.*
- *Under” Further Work Required”, the study authors further acknowledge that the study has been under resourced to begin with and that the resulting limitations probably invalidate the conclusions reached for renewables penetration.*

*The All Island Grid Study is not a sufficiently robust exercise on which to base Ireland’s Energy Policy”.*

*IAE Recommendation on Renewable Energy:*

1. *Re-examine Ireland’s policy in relation to renewables penetration in the light of both greatly changed economic circumstances and the severe deterioration of Ireland’s international competitive position. A properly resourced robust techno-economic analysis should be carried out by an experienced and reputable, independent entity operating within fairly wide terms of reference.*
2. *Pending completion of this analysis ,Ireland’s large scale renewable energy subsidies (REFIT) should be confined to the amount of renewable generation required to meet Ireland’s EU obligations (16% of energy from renewables) with priority given to projects which can be developed at relatively low overall cost, including any deep reinforcement costs”.*

### **CCA Recommendation**

- **The** renewables targets for the SEA need to be based on “a properly resourced robust techno-economic analysis carried out by an experienced and reputable independent entity” as called for by the Irish Academy of Engineering.

#### 4. Management of the SEA Process

##### CCA Recommendation

- Membership of the technical steering group should be widened to include environmental NGOs, heritage bodies, local government etc.
- To ensure public confidence, it is important that consultants selected to work on this project have no “conflict of interest” issues.
- Openness and transparency should be fostered by publishing all consultation comments, minutes of Technical Steering Group meetings, etc on the web as was done in the recent UK SEA.

#### 5. Timescales

##### CCA Recommendation

- At least 12 weeks should be given for consultation on the draft OREDP and associated Environmental **Report. Experience** in the UK has shown that this is necessary.

#### 6. Preparation of the Environmental Report

##### Comment

##### Consideration of Alternatives

Article 5 of the SEA Directive states that in preparation of an environmental report **“reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme, should be identified, described and evaluated”**

CCA are of the view that to comply with the Directive, it is important that reasonable alternatives are put forward and agreed at scoping stage. As a first step in agreeing reasonable alternatives, an objective for the plan must be set out in the context of national energy policy. Reasonable alternatives can then be reviewed in the Environmental Report, following SEA guidelines for this exercise.

##### CCA Recommendation

In order to comply with SEA **Directive, Article 5.1:**

- Objectives should be set for the draft ORED plan.
- Alternative means of reaching those objectives should be identified in the Scoping Document
- The potential environmental implications of these alternatives should be assessed in the Environmental Report.

## Table 6.1 SEA Topics

The SEA topics table states Directive Topics and lists Relevant Marine SEA Topics.

### CCA Recommendation

We would suggest additional topics as follows:

1. Directive Topic: Population and Human Health

Recommendation: Insert "Quality of Life"

(This important topic is not adequately covered by "recreation and tourism")

2. Directive Topic: Material Assets

Recommendation: Insert "Infrastructure on and offshore"

3. Directive Topics: General

Recommendation: Insert the following two new directive topics:

- Interrelationships: Cumulative Effects
- Interrelationships: Wider Policy Objectives

## 7.1 SEA Study Time Horizon

**Scope: It is proposed to set 2020 as the time horizon for the Environmental Assessment and Report**

### Comment

We suggest consideration should be given to a longer time frame for the following reasons:

- Ireland is on course to meet its legally binding renewables targets up to 2020 without significant amounts of ORED.
- Huge gaps exist in scientific data on environmental impacts of ORED. Industrial scale offshore wind farms with hundreds of 5MW turbines, such as those proposed for Ireland's shallow near- shore environments, have not been installed anywhere in the world. There is very little experience to learn from.
  - Technology is fast advancing. Floating wind turbines and deepwater turbines now at prototype stage will enable OWF to be placed in deeper water far from shore with possible environmental benefits. Technology for wave and tidal energy, which may prove particularly advantageous for Ireland, is developing.
  - Ireland is far from completing the survey and designation process for marine Special Areas of Conservation (SACs) under the Habitats Directive or for Special Areas of Protection (SPAs) under the Birds Directive.

- The economic crisis will have profound implications for future energy demand and supply in Ireland and in our major markets.
- Energy policy in adjoining markets is evolving e.g. recent UK decision to expand nuclear capacity may limit export potential and provide alternative sources of low carbon energy to Ireland.

**CCA Recommendation**

- As there is no immediate need for large scale ORED, it may be in the national interest to adopt a longer time horizon, say 2025, for the Environmental Assessment and Report, to allow for consideration of advances in scientific knowledge and technology.
- We must avoid making crucial decisions for tomorrow based on yesterday's data and technology

**7.2 Generation Capacity**

**Scope: It is proposed to assess the production of up to 4,500MW from offshore wind and 1,500MW from wave/tidal energy**

The scoping document states:

*“The SEA process and the Environmental Report will develop likely offshore renewable energy strategies based on the objectives of the White Paper, existing policies and strategies”.....“It is conceivable that up to 4000MW could be produced for export.....3000MW produced by wind and 1000MW by wave/tidal”.*

**Comment**

The use of Ireland’s vulnerable marine zone for production of 4000MW for export needs to be justified environmentally and economically.

The Irish Academy of Engineering “Review of Ireland’s Energy Policy” (see page 3) queries the economic justification for the high targets for renewables penetration which underpin the SEA.

CCA would also have concerns about the environmental justification of such a large scale industrial incursion into a marine environment already under serious threat from human activity. The impact of large scale offshore renewable energy projects is as yet largely unknown with, for example, just 1200MW of offshore wind installed worldwide at end 2008.

**CCA Recommendation**

- Our offshore renewable energy strategy needs to be based on realistic, updated targets and underpinned by sound evidence-based research so as to avoid damaging national impacts.

### 7.3 Geographical Scope

**Scope:** It is proposed to only consider the area below the Mean High Water Mark as the potential location for offshore renewables; however the effects above the mean high water mark will be considered

#### CCA Recommendation

- The effect of associated infrastructure should also be considered in order to prevent “project splitting” which contravenes Environmental Impact Assessment criteria.

#### 7.3.4.3 Wind Energy Resources

The scoping document states:

*Wind energy is believed to hold the greatest potential for harvesting renewable energy... Presently plans for over 2000MW are at various stages of completion.*

#### Comment

These plans have advanced under outdated and undemocratic legislation, the Foreshore Act 1933, drawn up before offshore wind farms were envisaged and long acknowledged to be unfit for purpose. At end 2005, 1620 MW of offshore wind power had been approved off Wicklow, 60% more than the total (1000 MW) then installed worldwide. It is our view that these planned large scale installations are inappropriately sited and inadequately assessed.

CCA are of the opinion that, in granting permission for these two extensive developments, the government is in breach of the SEA Directive and the consolidated EIA Directive.

#### CCA Recommendation

- The Environmental Report should review the manner in which 1,620 MW of offshore wind power was approved close to the Wicklow coastline under an inadequate legislative and regulatory regime, with possible serious damage to natural heritage.
- To comply with the SEA Directive, transposed into Irish law in 2004, a cumulative impact analysis of these large scale developments must be carried out

### 7.3.5.1 Biodiversity: Protected Sites Habitats and Species

The surveying and designation of sites around Ireland to conserve important marine wildlife is far from complete. Numerous knowledge gaps and reliance on existing limited data will compromise the validity of the SEA and lead to decisions which threaten the natural environment.

Sandbanks, slightly covered by sea water at all times, are a habitat listed on Annex 1 of the EC Habitats Directive, qualifying as a feature for the selection of a Special Area of Conservation. They are of high conservation value because of their general scarcity and the diversity of the species they support. They are rich in wildlife and are very important feeding areas for sea birds.

A total of 21 sandbanks have been identified around Ireland. These are found mainly in the Irish Sea. The bulk of the 2000MW of offshore wind farm development proposed for Ireland is located on these shallow sandbanks off the East coast.

Wind farm development along with aggregate extraction was identified by National Parks and Wildlife Service (2008) as a threat to the integrity of the sandbanks. For this reason NPWS assess their conservation status as “poor”.

#### Recommendation

- Knowledge gaps must be filled and survey and designation process completed before any new sites are leased
- In the absence of comprehensive data, the precautionary principle must apply
- Caution should be used in applying the results of research on impacts of small first generation offshore windfarms to the large scale offshore windfarms proposed on sandbanks close to Ireland’s coastline, with no prior government screening or selection of development zones.
- Ireland is expected to reach its legally binding targets for renewable energy. Why is such massive development of our seas being contemplated in the light of incomplete knowledge of its effects?

### 7.3.5. Biodiversity

Cumulative and combined impacts on biodiversity of numerous wind farms and other developments in the marine environment must be addressed in depth and in detail.

#### CCA Recommendation

Amend scope as follows: It is proposed to assess impacts, *including cumulative impacts*, of offshore energy devices in all areas on marine species.

#### **7.3.5.10 Landscapes/seascapes and areas of high scenic amenity**

**Scope: It is proposed to assess the potential visual impacts of the installation of offshore energy devices located in all areas on landscapes /seascapes and areas of high scenic amenity value**

#### **Comment**

The issue of landscape/seascape impact is particularly important for Ireland – a point underlined in the scoping document. As a small island nation, coastal landscapes are a vital part of our heritage, contributing to our quality of life and underpinning economic activity. The preservation of national heritage is one of the principal aims of sustainable development to which Ireland is committed under EU membership

Ireland's national heritage as defined in the Heritage Act (Section 6) includes seascapes. Increasingly it is recognised that the assessment of landscape character should also encompass coastal and seascape character, acknowledging the fact that the character of the coast and of marine areas affects the land and vice versa.

Much of Ireland's coastline is designated as "Area of Outstanding Natural Beauty" in local county development plans. This underlines the high importance attached to coastal areas and their significance for local communities and economies. The extensive offshore wind farm development proposed in Ireland's inshore waters will have a major impact on the character and quality of AONBs and the coastal "views and prospects" listed for protection.

At scoping stage, it is important that particular attention is paid to the manner in which landscape/seascape impact will be addressed in the Environmental Report. Given the complete lack of baseline studies, it is clear that appropriate research will need to be commissioned to provide rigorous Landscape Character Assessments for the full coastal zone in accordance with the European Landscape Convention. The piecemeal consent process to date has not used this method and is thus deficient.

This issue has been given detailed attention in the UK with recent studies on topics such as best practice in seascape assessment (Countryside Council for Wales 2001); sensitivity and capacity of seascapes in relation to wind farms (Scottish Natural Heritage 2005); guidance on the assessment of the visual impact of offshore wind farms (Department of Trade and Industry 2005); etc.

As part of the most recent UK Offshore Energy SEA, independent consultants were commissioned to carry out a Seascape Study (2009). The objectives of the study were "to identify seascape units" and "guide appropriate seascape buffer zones for Round 3 and subsequent rounds of offshore wind farm leasing".

The project aimed *"to provide reasoned (evidence backed) advice on seascape buffer zones needed to reduce the potential visual impact of offshore wind farms to the point where adverse impact would not be significant"*. The report included:

- Verification of Seascape Visual Impact assessments through site visits to constructed offshore windfarms

- Consideration of the effects of elevation, designations, lighting, cumulative effects, etc.
- Research into international approaches to windfarm planning, buffer zones, etc (Note: Germany, Netherlands and Belgium have introduced 12nm buffer zones)

CCA would respectfully suggest that Ireland follow the UK example in ensuring that development of ORED does not harm our coastal landscapes. Specifically:

1. Base line studies on landscape/seascape character, quality , value and carrying capacity need to be carried out
2. Visual impact assessment methodology must be amended to reflect the field of view of the human eye (40 degrees), rather than the accepted photomontages based on unrealistic panoramic views which substantially understate visual impact. (In this regard it would be useful to compare the “in the field reality” of the Arklow Bank Wind Park –Phase One, with the pre-construction panoramic photomontages).
3. Seascape buffer zones need to be assessed.

The Environmental Report should also consider the effect of terrestrial infrastructure on views and landscape character. Cumulative visual impact and impact of night lighting should also be considered

The scope needs to be expanded so that effects on landscape /seascape character and quality are also assessed.

#### **CCA Recommendation**

- Amend Scope as follows: It is proposed to assess the potential visual impacts of the installation of offshore energy devices and associated infrastructure located in all areas on landscape /seascape character, quality and amenity value
- Landscape Character Assessment should be carried out in accordance with the European Landscape Convention, ratified by Ireland in 2002.
- Visual assessment methodology must reflect the field of view of the human eye, i.e. 40 degrees.

#### 7.3.6.4 Recreation and Tourism

**Scope: It is proposed to assess the impacts of developing offshore renewable energy within areas that are of importance to marine tourism and leisure interests**

##### **Comment**

This is an issue of great importance to the Irish economy and to local quality of life. Ireland's beautiful landscape, a unique blend of mountain, countryside and seascape, still largely unspoilt, is our prime tourist attraction.

The phrase "marine tourism" is too restrictive. Many general tourists visit or travel through coastal areas without specifically being engaged in marine tourist pursuits. The word "tourism" should be used instead of "marine tourism".

It is important that the Report recognises and gives due weight to the enhancement of quality of life derived from living in an area with access to an attractive natural coastal zone with open and unspoiled seascape. The phrase "leisure interests" does not embody the important quality of life aspect of living in coastal areas.

##### **CCA Recommendation**

- Amend scope as follows: It is proposed to assess the impacts of developing offshore renewable energy within areas that are of importance to quality of life, tourism and leisure interests.

#### 7.4 Description of offshore renewable energy devices

##### **CCA Recommendation**

- The Environmental Report should include a comparative analysis of benefits and disadvantages for Ireland of various types of offshore renewable energy – wind, wave and tidal. Social, economic and environmental impacts should be considered.

## **7 Consultation**

A determined effort must be made to redress the serious democratic deficit which has surrounded the awarding of foreshore leases. This democratic deficit stems largely from the fact that local authorities have no statutory involvement in the awarding of these leases.

## **Recommendations**

- An analysis should be carried out as to who is likely to be affected by the proposals and therefore who should be included as a consultee.
- The involvement of key stakeholders such as local government, heritage groups and community groups should be actively sought by direct approach explaining potential impact
- Consultation responses should be published on the web in the interests of openness and transparency.

## **Appendix B**

### **Preliminary List of Relevant Policies, Obligations and Regulatory Instruments**

CCA recommends inclusion of the following:

#### **National Policy and Legislation**

- Local County Development Plans
- EirGrid: Generation Adequacy Report
- Draft National Landscape Strategy
- Landscape Character Assessments (Heritage Council)
- National Tourism Strategy

#### **Marine**

- Commission Communication on Integrated Coastal Zone Management (2000)
- Roadmap for Marine Spatial Planning - Achieving Common Principles in the EU (2008)

#### **Environment & Biodiversity**

- National Biodiversity Plan
- OSPAR recent reports specific to offshore wind

#### **Energy**

- Irish Academy of Engineering – ‘Review of Ireland’s Energy Policy in the Context of the Changing Economy’

#### **Archaeology and Cultural Heritage**

- Council of Europe: European Landscape Convention

#### **Other**

- CCA Global Offshore Wind Farms: Comparison Ireland vs. The World

(This chart prepared by Coastal Concern Alliance, based on OSPAR data, shows how Irish offshore wind farms are out of line with good international practice in terms of size, scale and proximity to shore.)

# APPENDIX

## **Irish Academy of Engineering - Review of Ireland's Energy Policy in the Context of the Changing Economy, 2009**

### **Summary of recommendations**

1. Freeze all regulated capital expenditure pending a robust techno-economic analysis incorporating up to date assumptions on demand growth and primary energy supply and prices.
2. Promote further efficiency improvement programmes in Ireland's building stock bearing in mind that such investment will provide significant stimulus to the economy and encourage job creation. Capital should be diverted from energy production/transmission projects to conservation programmes and used to fund a major new national energy efficiency programme. Proper standards, control measures and output targets should be established and professionally managed by a specialised coordinating agency to ensure programmes with predictably high rates of return are prioritised.
3. Re-examine Ireland's policy in relation to renewables penetration in the light of both greatly changed economic circumstances and the severe deterioration of Ireland's international competitive position. A properly resourced robust techno-economic analysis should be carried out by an experienced and reputable independent entity operating within a fairly wide terms of reference. Pending completion of this analysis Ireland's large scale renewable energy subsidies (REFIT) should be confined to the amount of renewable generation required to meet Ireland's EU obligations with priority given to projects which can be developed at relatively low overall cost, including any deep reinforcement costs.
4. The Commission for Energy Regulation should ensure that the European equivalent of the North American "Rate Impact Analysis" is formally carried out in respect of all policy and major investment decisions. Such studies should be performed by independent and experienced advisory entities and the results published for consultation prior to implementation of the relevant policy or investment decision.
5. Defer East-West electricity interconnection pending a full techno-economic study confirming its early requirement and economic viability.

6. Closely monitor the generation market to ensure that short term overcapacity costs are carried by investors and not by consumers. Wherever possible discourage the construction of generation overcapacity in the overall interest of economic efficiency.
7. Review and alter as necessary the planning, regulatory and legal framework for large scale infrastructure projects so as to ensure that major capital projects can be planned and completed in a predictable timescale and with more predictable economic returns.
8. Support the consideration of all feasible mainstream technology options with long term potential and remove inappropriate constraints such as the legislative barrier against nuclear generation. Government financial support should be confined to pilot projects and studies utilising Irish technical expertise wherever possible. Full scale deployment of new technologies should not impose financial risk on the Irish electricity consumer (or taxpayer). Evidence-based research, rather than ideology, should determine public energy policy. Government should adopt a position of “technology neutrality” in relation to new technologies.
9. Postpone any major commitment to smart metering investment (currently estimated at €1bn) until the results of national and international pilot schemes are available and a robust techno-economic investment case is made.
10. Structure incentives to generators, particularly renewable generators, to locate plant at optimum transmission locations and thus minimise the network investment necessary to connect such plant.
11. Consider options other than gas/wind for Ireland’s long term primary energy mix and develop appropriate alternative scenarios for further study. Recognise the country’s continuing vulnerability to major gas supply interruptions and expedite projects to mitigate this risk. In the context of future East-West interconnection, consider acquiring long term electricity supplies from the planned new wave of UK nuclear projects.
12. Ensure that the purchase of emission quotas is considered as a valid low risk policy option for Ireland on a par with low carbon technologies in order to meet our international carbon abatement obligations. Avoid imposing carbon abatement standards in Ireland which are more stringent or expensive than those imposed by our major European trading partners.
13. Consider the merits of using the current tax reform process to follow the example of countries like Denmark and Germany and rebalance the heavy cost of Ireland’s carbon reduction policies away from the traded sector thus maintaining competitiveness in our export oriented industries and employment in Ireland’s workforce.
14. Reassess the stated aim of having 200,000 electric vehicles operating in Ireland by 2020. The heavy cost of both infrastructure and vehicles, the minor environmental benefits and the tax implications, make it an unwise investment now without significant change in electricity supply sources and advances in the technology itself.